MEMORANDUM

TO: Rules and Ethics Chairman Andrew Sabadash, University of Florida Supreme Court
FROM: Tyler Sklar
DATE: February 3, 2026
RE: *The Vision Party Probe*

JURISDICTION

This Petition arises under Chapter 101 of the Student Body Statutes governing ethics complaints, investigations, and proceedings before the Commission on Ethics.

Student Body Statute 101.71 mandates that:

> "Upon a written complaint of any student, the Rules and Ethics Chairperson of the Student Senate shall make a preliminary investigation into any alleged violation of this chapter."

Where the Rules and Ethics Chairperson is not independent of ties to the tortfeasor, Student Body Statute 101.72 provides that:

> "Upon request, the Chief Justice of the Supreme Court may appoint a special investigator to assume the responsibilities of the Rules and Ethics Chairperson as described herein. The Rules and Ethics Chairperson or the appointed investigator must be independent of ties to the tortfeasor pursuant to 101.61."

Student Body Statute 101.61 defines the required independence and prohibits disqualifying ties, including:

> "No member shall be a relative, a mutual member of a selective organization or executive board, roommate, or personal friend of the complainant or the person named in the complaint."

Student Body Statute 101.73 further provides that:

> "Upon a showing of probable cause to believe that a violation of this chapter has been or is being committed, the Chief Justice, or Executive Director/Chancellor of the Honor Code Administration in case of the investigation of the Chief Justice, shall convene the Commission on Ethics to hear evidence and argument on said violation and all related violations."

In this matter, Petitioners filed a written ethics Complaint naming the Senate President as an accused person. The Rules and Ethics Chairperson is a mutual member of the Senate Executive Board with the Senate President, constituting a prohibited tie under Student Body Statute 101.61. As a result, the Rules and Ethics Chairperson must be recused, and a special investigator must be appointed pursuant to Statute 101.72.

Petitioners further allege that the Chief Justice is an interested party due to alleged involvement in the conduct described in the Complaint and therefore cannot lawfully invoke Student Body Statute 101.72 or appoint the special investigator. Student Body Statute 402.1 provides:

> "In any case before the court any party to said cause or any interested party, may at any time before final judgment, file a motion requesting a disqualification of a member of the court."

Petitioners invoke the Court's authority to ensure compliance with Chapter 101 with Rule 6.2 of the Supreme Court Rules of Practice & Procedure for the appointment of an acting Chief Justice who will be appointing the special investigator. Rule 6.2 of the Supreme Court Rules of Practice & Procedure states:

"In the event that the Chief Justice recuses themselves, the Chief Justice shall designate an Associate Justice to serve as the Acting Chief Justice for the case for which the Chief Justice is recused."

Furthermore, the Petitioners filed this Complaint after filing several Public Records Requests (PRRs) to the University of Florida Supreme Court in the Fall 2025 semester receiving no satisfactory response after a few months. These PRRs are pursuant to Student Body Statute 102.1, which states:

"The Student Government, as a state governmental agency, shall comply with section 286.011, Florida Statutes (The Government in the Sunshine Law)."

The lack of a response has led the Petitioners to believe that the Court may allegedly be slowing down the release of Public Records due to content of the materials they may receive or lack thereof for deliberation on several Supreme Court cases they have filed related to apportionment, electoral fairness, accountability, and student rights.

Petitioners therefore move for disqualification of the Chief Justice under Student Body Statute 402.1 as to any actions taken in connection with the Complaint, including invocation of Student Body Statute 101.72 and appointment of any special investigator. Because the Rules and Ethics Chair is disqualified under Student Body Statute 101.61 and 101.72, and because the Chief Justice must be disqualified under Student Body Statute 402.1 before further action may be

taken, this Petition properly invokes the Court's authority under Rule 6.2 to ensure compliance with Chapter 101.

TABLE OF AUTHORITIES

Statutes

Student Body Statute 101.41 — Conflict of Interest

- "No officers or employee of Student Government shall participate in any private business or professional activity or have any direct or indirect financial interest which would place that person in a position where there is a conflict between that private interest and the best interests of the Student Body."

Student Body Statute 101.43 — Unlawful Compensation or Regard for Official Behavior

- "No person shall corruptly give, offer, or promise to any Student Government officer or agree to accept, any pecuniary or other benefit not authorized by Student Body Law, for the past, present, or future performance or non-performance of any act which the person believes to have been, or the officer, or employee represents as have been, within the official capacity of the officer or employee."

Student Body Statute 101.45 — Inducing to Act

- "No office or employee of Student Government shall aid, advise, procure, or in any way induce another to act in violation of this chapter."

Student Body Statute 101.61 — Membership / Independence Requirements

- "The commission shall be composed of fifteen (15) students selected at random from the Student Body by the Director of Student Engagement."

- "No member may hold any office or employment in Student Government."

- "No member shall be a relative, a mutual member of a selective organization or executive board, roommate, or personal friend of the complainant or the person named in the

complaint."

Student Body Statute 101.71 — Preliminary Investigation

- "Upon a written complaint of any student, the Rules and Ethics Chairperson of the Student Senate shall make a preliminary investigation into any alleged violation of this chapter."

Student Body Statute 101.72 — Appointment of Special Investigator

- "Upon request, the Chief Justice of the Supreme Court may appoint a special investigator to assume the responsibilities of the Rules and Ethics Chairperson as described herein."

- "The Rules and Ethics Chairperson or the appointed investigator must be independent of ties to the tortfeasor pursuant to 101.61."

Student Body Statute 101.73 — Convening the Commission on Ethics

- "Upon a showing of probable cause to believe that a violation of this chapter has been or is being committed, the Chief Justice, or Executive Director/Chancellor of the Honor Code Administration in case of the investigation of the Chief Justice, shall convene the Commission on Ethics to hear evidence and argument on said violation and all related violations."

Student Body Statute 101.731 — Subpoena Power; Presiding Officer; Investigation Duties

- "The commission may use the subpoena power pursuant to section 401.3 to obtain evidence and testimony under oath."

- "The judicial officer who convened the commission shall preside over it and sign all subpoenas."

- "The Rules and Ethics Chairperson shall direct the investigation of the commission, question witnesses before it, and shall be its legal advisor."

Student Body Statute 101.732 — Written Report; Approval; Submission

- "Upon the conclusion of its investigation, the commission, with the assistance of the Rules and Ethics Chairperson, shall present its findings and conclusions in a written report which must be approved by ten (10) members of the commission."

- "The approved report shall be submitted to the presiding officer for review, and then to all individuals accused of violations in the report."

Student Body Statute 402.1 — Disqualification and Recusal

- "In any case before the court any party to said cause or any interested party, may at any time before final judgment, file a motion requesting a disqualification of a member of the court."

Supreme Court Rules of Practice & Procedure

Rule 6.2 — Appointment of an Associate Justice to serve as acting Chief Justice

- "In the event that the Chief Justice recuses themselves, the Chief Justice shall designate an Associate Justice to serve as the Acting Chief Justice for the case for which the Chief Justice is recused."

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STATEMENT OF FACTS

This section discusses the charges of unlawful compensation or regard for official behavior, conflict of interest, and inducement to act that have been alleged to have been committed by **Senate President Maya Idiculla** and **Chief Justice Hagen Turner** as described in **Chapter 101 of the Student Government Code of Ethics**. Because the Rules and Ethics Chair is a mutual member of the Student Senate Executive Board, which the Senate President is part of, they are required to recuse themselves per the protocol for ethics complaints in Chapter 101. The following ten evidentiary sets, each with numerous exhibits, establish the concrete basis for the Petitioners' allegations.

Set 1-2 establishes the **historical and modern climate of campus politics** within the **University of Florida Student Government** through existence of a **political machine** operating within the institution through **a united coalition of fraternities, sororities, and multicultural**

organizations known as '**the System**', which utilizes an exclusive leadership honorary, **Florida Blue Key (FBK)**, as the nucleus of patronage, power, and influence on campus. The evidence presented in the **1998 Charles Grapski defamation case** against FBK enabled a court to **legally recognize** the organization's **historical influence** in Student Government through a **'house/group system'** while finding FBK liable to defaming Grapski after he ran against them for Student Body President. As documented through academic papers and media articles, the political machine has **survived and reformed** after 1998 to **persistently dominate** student self-governance despite opposition from '**the Independent movement**' or '**Indies**,' for short. For every SG election since **2005**, three Greek life blocs and multicultural organizations have consolidated under **one party backed by Florida Blue Key members (FBK-backed)** to achieve domination in the executive branch and the **University of Florida Student Senate**.

Set 3-6 establishes the **voting mechanics** of the System's continuing dominance in the executive and legislative branches in the Student Government elections. Through the use of '**I Voted' stickers**, **sticker boards**, **voter coercion**, and **food and alcohol incentives** as exposed in the **2010 Unite Tapes**, the System manages thousands of students through **compulsory voting** within Greek life organizations. Extensive allegations of FBK's **monetary conflicts of interest** on **the control of the Student Senate Budget & Appropriation Committee's annual Activity & Service Fee budget of over 24 million dollars** within **ACCENT Speakers Bureau** and **Student Government Productions (SGP)** through **'legacy positions'** for Alpha Epsilon Pi and Theta Chi show a possible motive for such extreme electoral tactics. Articles by the **Independent Florida Alligator** and **UF Politics** demonstrate a similar pattern of these extreme tactics to the newest iteration of the FBK-backed party, the **Vision Party**. Evidence from the **Fall 2023 election,** such as **sticker collection boards** and **FBK member Jared Weingard's** alleged participation in compulsory voting in Greek life, provides this crucial link. Later interviews in **2025** with the Alligator from students in sororities show that compulsory voting is still occurring, with many sororities forcing or recommending that their members vote for the Vision Party's slate of candidates.

Set 7-8 establishes the currently enabled **state capture** of the University of Florida Student Government by Florida Blue Key, which has been aided by the **heads of the legislative and judicial branches**. Through an established connection with **FBK membership** in different tapping classes and **mutual political alignment** with the immediate FBK-backed predecessor party, the **Gator Party**. Additional evidence that directly connects FBK and the Supreme Court is shown in interviews with an **anonymous Associate Justice** who was **threatened by an FBK donor to change their ruling,** and **former Chief Justice Matt Michel,** who collaborates with previous evidence on the existence of the System.

Set 9-10 establishes the implementation and maintenance of a **winner-take-all electoral system** that ensures Florida Blue Key's **return to dominance** in the University of Florida Student Senate for total control over budgetary matters. After the Indies through the **Change Party** won two elections in a row to achieve a majority in the Student Senate, FBK's control over budgetary matters was threatened. As a result, various student court documents showcase how the Supreme Court utilized its **judicial power** to prevent the Indies from achieving total control of the Budget & Appropriations Committee through a **forced compromise**, prevented them from passing their **sponsored amendments** on the annual budget, ruled a more competitive, multi-district model **unconstitutional**, and implemented an **at-Large, off-campus model** through an injunction. The election results from Fall 2023, Fall 2024, and Fall 2025 showed an immediate decline in the power of other parties, with the Vision Party's **slate of candidates sweeping every off-campus seat (37)**. Through the **Student Senate Judiciary Committee** and the Supreme Court, **claims of discrimination or voter dilution** were dismissed as insubstantial, while the continued maintenance of the map was justified due to a lack of data from the Registrar's Office, as mandated by **Student Body Statute 322.51**, ensuring the at-Large model would remain constitutional. The Student Senate, under the current Senate President, recently **passed** an apportionment bill (**Student Senate Bill 2025-1209: Reapportionment Act Fall 2026**) that continued the at-Large model's existence. When the Supreme Court, under the current Chief Justice, was met with several cases from the Petitioners that threatened the constitutionality of the at-Large model in 2025, the Court refused to hold oral hearings or properly respond to petitions after 14 days, violating their own **Supreme Court Rules of Practice & Procedure** under **Rule 4.1 and Rule 7.4,** respectively. As a result, the Petitioners submitted several Public Record Requests (PRRs) to the Supreme Court for communications on each case under **Student Body Statute 102.1** and received no substantial response from the Supreme Court after a few months.

In conclusion, all of the facts established in **Sets 1-10** have led the Petitioners to the conclusion that **Senate President Maya Idiculla** and **Chief Justice Hagen Turner** are acting on unlawful regard for official behavior to maintain Florida Blue Key's influence in the University of Florida Student Government under **the Vision Party**, violating **Student Body Statute 101.43**. Such influence enables FBK to exert **total control** over the **Student Senate Budget & Appropriations** Committee, allowing them to continue their monetary conflicts of interest within **ACCENT Speakers Bureau** and **Student Government Productions**, in violation of **Student Body Statute 101.41**. In order to conduct such illegal orders and enable the aforementioned conflict of interests through the Supreme Court, the Chief Justice has induced the other Associate Justices or refrained them from acting to delay the release of **Public Records Requests** from the Petitioners and violate **Rule 4.1** and **Rule 7.4** of the Supreme Court Rules and Procedures, which violates **Student Body Statute 101.45**. These acts ensure that the at-Large, off-campus district that enables a winner-take-all system favorable to the voter blocs of **the**

System isn't ruled unconstitutional, thereby allowing the return of a more competitive multi-district mode that threatens Vision Party's control of the Student Senate.

A. The Ethics Complaint

1. On **February 3, 2026**, Petitioners submitted a written ethics Complaint pursuant to Student Body Statute 101.71.

2. The Complaint names **University of Florida Student Senate President Maya Idiculla** as an accused person.

3. The Complaint further identifies **Chief Justice of the University of Florida Supreme Court Hagen Turner** as an accused person and/or interested party due to alleged involvement in the conduct at issue.

4. The Complaint alleges violations of **Student Body Statutes 101.43, 101.41, and 101.45** among other provisions.

B. Charge 1: Unlawful Compensation or Regard for Official Behavior (Stat. 101.43)

Student Body Statute 101.43 provides:

> "No person shall corruptly give, offer, or promise to any Student Government officer or agree to accept, any pecuniary or other benefit not authorized by Student Body Law, for the past, present, or future performance or non-performance of any act which the person believes to have been, or the officer, or employee represents as have been, within the official capacity of the officer or employee."

Petitioners allege that the Senate President Maya Idiculla and Chief Justice Hagen Turner are acting on illegal orders of conduct as described in Charge 1, and that the Senate President and Chief Justice were both instrumental in its adoption and execution. Petitioners further allege that the Senate President has been ordered to prevent recusal by the Court in order to retain control over proceedings that threaten the Student Government political party, the Vision Party's supermajority under a winner-take-all political system through the at-Large, off-campus district (**Exhibit 9H-9S**). The at-Large model, which was implemented in Fall 2023 through an injunction from the Supreme Court, replaced a multi-district model that enabled Student Government minority parties to win a majority in the chamber. Through constant victories under this district that encompasses more than a third of the seats in the legislature, the Vision Party has retained a majority that is necessary to pass budgetary matters.

C. Charge 2: Conflict of Interest (Stat. 101.41)

Student Body Statute 101.41 provides:

> "No officers or employee of Student Government shall participate in any private business or professional activity or have any direct or indirect financial interest which would place that person in a position where there is a conflict between that private interest and the best interests of the Student Body."

Petitioners allege that certain private organizations and/or interests ("Florida Blue Key," or "FBK" as defined in **Exhibit 1A-1I, 2A-2C, 4A-4F, 5B-5C**) profit from Student Government operations and outcomes; that FBK lost Senate majority control and thus budgetary influence; and that Supreme Court actions operated to restore FBK's influence within the Senate, creating an improper incentive for Court officials to preserve structures favorable to FBK.

D. Charge 3: Inducing to Act (Stat. 101.45)

Student Body Statute 101.45 provides:

> "No office or employee of Student Government shall aid, advise, procure, or in any way induce another to act in violation of this chapter."

Petitioners allege that Chief Justice Hagen Turner has been inducing the other Associate Justices on the Supreme Court to act in violation of Student Body Statute 101.43 to further the interests of Florida Blue Key as defined in **Exhibit 7B, 8A-8D** and prevent a political environment within Student Government that is unfavorable to the private organization (**Exhibit 9A-9B**).

E. Independence Conflict Requiring Recusal of the Rules and Ethics Chair

5. The Rules and Ethics Chairperson is a mutual member of the Senate Executive Board with the Senate President named in the Complaint.

6. Under Statute 101.61, mutual membership in an executive board with a person named in the complaint constitutes a prohibited tie and defeats independence.

7. Under Statute 101.72, the Rules and Ethics Chairperson must be recused, and an independent special investigator must assume the Chair's investigative responsibilities.

F. Evidentiary Sets

Petitioners will submit the following evidentiary sets in support of the Complaint, Charges, and requested relief:

- **SET 1: 1998 Grapski defamation case against Florida Blue Key establishes their historical involvement in the University of Florida Student Government through the operation of a political machine (Exhibits 1A-1I)**

Charles Grapski v. Peter Benes Vlcek, John McGovern, Tony Vu, and Florida Blue Key, Inc. (Case 95-4412-CA, Alachua County Court) establishes that **Florida Blue Key**, an exclusive leadership honorary, has historical ties to the University of Florida Student Government by operating a **political machine**. This political machine utilizes **a house and group system** within **Greek life** to maintain loyalty, control, patronage, and votes. Exhibits include a judicial notice, testimony, affidavits, and depositions from former Student Government officials that describe how the political machine determines candidates, negotiates among houses and organizations with positions, and manipulates the electoral process through **voter coercion** within **fraternities** and **sororities**. The jury ultimately found Florida Blue Key liable for defamation and conspiracy to defame Charles Grapski for false charges of child molestation after running against the FBK-backed party in an election. Florida Blue Key eventually settled out of court for $85,000.

Exhibit 1A: Judicial Notice from Charles Grapski v. Peters Benes Vlcek, John McGovern, Tony Vu, and Florida Blue Key, Inc. that establishes FBK's historical involvement in University of Florida Student Government

https://www.scribd.com/document/29138637/Judicial-Notice

No. 3(a)

JUDICIAL NOTICE

The Court has taken judicial notice that:

1. Defendant FLORIDA BLUE KEY has historically undertaken a political function in connection with student government affairs at the University of Florida in addition to its other functions involving Gator Growl, Homecoming, and other matters.

2. Defendant FLORIDA BLUE KEY has historically involved itself in University of Florida student government elections by supporting parties and candidates for office and other means.

3. Defendant FLORIDA BLUE KEY has historically employed a house and group system of control over members and aspiring members to determine candidates for student government elected and appointed offices, Florida Blue Key membership, and slates of candidates to run for student government offices and political parties controlled by Florida Blue Key through its house and group system or otherwise.

4. At the time of the Spring 1995 University of Florida student government elections, Defendant FLORIDA BLUE KEY undertook a political function in connection with student government affairs at the University of Florida in addition to its other functions involving Gator Growl, Homecoming, and other matters.

5. In the Spring 1995 University of Florida student government elections, FLORIDA BLUE KEY employed the house and group system to support candidates through the formation of a political party known as the Focus Party.

6. It remains for you, the jury, to determine whether FLORIDA BLUE KEY:

a) in the conduct of its official corporate business supported the Focus Party;

b) in the conduct of its official corporate business participated in or endorsed the tortious conduct alleged to have been conducted against the Plaintiff; or

c) in any capacity, official or otherwise, is responsible for the activities of the Focus Party.

Exhibit 1B: Testimony from former Student Body President Kevin Mayeux on the ways in which fraternities manipulate their members to win elections for the FBK-backed party and punish members for challenging the house/group system.

https://www.scribd.com/doc/29133247/Way-to-Win

Q. Now, was it 1993 that you ran for treasurer?
A. Yes, it was.
Q. And at that point in time you did not run with the Greek supported party, did you?
A. Most of the fraternities and sororities back another party.
Q. And you lost that election?
A. I did lose that election.
Q. In 1995 you ran under the Focus Party?
A. Yes.
Q. And that was the party supported by the Greeks?
A. Most of the fraternities and sororities did support the Focus Party.
Q. So being a person who has some political acumen and you have learned that you ran with the Greek-backed party, you won, you ran with another party, you lost, then you ran with the Greek party, you won, you learned that the Greek party was the way to win, didn't you?
A. It's the easiest way to win an election.
Q. Now, you were asked a number of questions about agency and ratification. Do you recall all those questions?
A. Yes, I do.
Q. Using all those legal terms that Mr. Roscow asked you about?

A. There was a dispute about the reason.

Q. In fact, there was a tape -- who is Carl Leibman?

A. Carl Leibman was president of the fraternity at that time.

Q. Do you recall Mr. Leibman having a tape recording giving a different reason for why Mr. Lynch was removed from the fraternity?

A. I was not present at the meeting where Mr. Leibman -- I'm sorry, where Mr. -- what was his name again?

Q. Lynch.

A. -- Mr. Lynch was removed.

Q. But you know of the tape involving Mr. Leibman in which he gave a statement to the contrary?

A. It was reported that there was a tape recording made in violation of Florida statutes, a third degree felony.

Q. I want to get to the meat of it, though. In fact, Mr. Leibman was tape recorded saying and admitting that the reason Mr. Lynch was removed was not because he didn't pay his dues but because he ran against the Vision Party.

A. I do not know. I do not have a copy of the tape.

Q. You've heard the tape, haven't you?
A. I have not heard the tape in its entirety.
Q. You've heard part of the tape?
A. I heard parts of the tape. I do not recall that being on the portion that I've heard.
Q. The tape was played into the senate record, wasn't it?
A. It was played into the senate record. I'm not sure if it was played in its entirety.
Q. So you know full well that Mr. Leibman, in fact, has been recorded as saying that the reason Mr. Lynch was removed from your fraternity was because Mr. Lynch ran against the Vision Party?
A. I do not know that Mr. Leibman was recorded.
Q. You heard part of the tape.
A. If someone makes a tape recording and purports it to be you or anyone else, Counselor, but you deny that was you and you weren't present when the tape was made, how do you know that tape was actually you or whoever it was purported to be?
Q. In fact, this incident involving Travis Lynch got a great deal of play in the press, did it not?
A. It was reported in the Alligator and I believe another newspaper.
Q. Well, it was also reported in the Orange and

Blue magazine?

A. Okay.

Q. In the article Greek Ruling Class?

A. I'm not familiar with that but I'll just accept your characterization.

Q. Now, this Carl Leibman that I just mentioned who was involved with the Lynch matter, was Mr. Lynch involved in the Focus Party in 1995?

A. Mr. Lynch was not involved with the Focus Party.

Q. Did you just tell us that Mr. Leibman was not involved in the Focus Party?

A. No. You asked if Mr. Lynch was involved with the Focus Party.

Q. Mr. Leibman, I apologize.

A. Mr. Leibman was involved in the Focus Party, yes.

Q. Wasn't Mr. Leibman the president?

A. I believe that's what was listed on the student activities form.

Q. Would you like to see?

A. I believe I saw it yesterday, yes.

Q. Carl Leibman was the president of the Focus Party?

A. Yes.

Q. Let's see. Now, Mr. Leibman who was your fraternity brother who was involved in the Lynch matter when you ran for the Vision Party two years or three years later becomes president of the Focus Party?

A. Five years later.

Q. '92 was the Lynch matter?

A. I believe the Lynch matter was 1990.

Q. When did you run for --

A. 1990-91 I was student body vice president.

Q. Okay. By the way, you said Mr. Leibman was in your fraternity; is that right?

A. Yes, he was.

Q. And he was Florida Blue Key?

A. He was tapped into Florida Blue Key, yes.

Q. How many Florida Blue Key members were in your fraternity?

A. Cumulative throughout the years?

Q. No. When you formed the Focus Party how many fraternity members?

A. Oh, seven or eight.

Q. Now, the people that you got together to form the Focus Party with, Jay Philp was the vice president?

A. Yes.

Q. Was he Florida Blue Key?

A. Yes.

Exhibit 1C: Deposition from former Student Body President Howard Christopher Tompkins III on the mechanics of the FBK tapping process and group/house system supporting the FBK-backed party

https://www.scribd.com/document/29137991/Thompkins-Deposition-Part-1,
https://www.scribd.com/document/29138292/Thompkins-Deposition-Part-2,

the University of Florida.

A. I was elected to the student senate five times, starting in fall of 1989. And I was elected student body treasurer 1993——spring of '93. And student body president, spring of 1994. I was also involved in Accent and several other student government organizations.

Q. Would you please describe the Florida Blue Key tapping process, and particularly the role of group leaders and the house and group system in the process, if any.

A. The process of tapping, from my tenure there, was one of students submitted their résumés on legal-sized sheets of paper. They were compiled and heard by a tapping committee——excuse me——by evaluations committee, based on rules set by a tapping committee.

And the evaluations committee, I believe, had four students and three faculty members. They ranked those students highly recommended, recommended, not recommended, or not qualified.

And then we went into a selection process where individuals got together and came up with a list, a float list. And sometimes that list got approved; sometimes it didn't. Numerous times students who were not on the list got in.

Q. Well, tell us about the float list and how they were created.

A. Individuals from the different——from different houses would talk to whoever their group leader was about their priority——their people that they wanted to get in. And those people would come up with a list based on——you know, almost generally speaking, all the highly recommended people got in first round. Only highly recommended or recommended people could be considered first round. And then they kind of got debated out of there from there.

Q. Well, what is it——your opinion as to whether the people that were most favored by the various group leaders would ultimately end up being tapped?

A. A pretty high percentage, unless there were extenuating circumstances. If a student had had problems, either disciplinary or criminal or academic or something, then regardless of whether they were on the float or not, then they would probably not get in, because they still needed two-thirds of a secret ballot.

Q. What role does the Florida Blue Key group leaders——the group leaders and the house and group system——have in selecting candidates for the student government, presidency, for the Florida Blue Key president, for the chairman of the political party that's going to run in a particular student government election to support candidates——

MR. BOBEK: Objection; leading.

BY MR. LITTLE:

Q. ——and the selection of Homecoming director and Gator Growl chairman, Mr. Tompkins?

A. A lot of question there.

Depends on——each one of those is——is sometimes related. The——the group leaders obviously had more of a——more of an interest and more of a say in things that were internal Blue Key positions. They also had some sort of impact on the student government elections.

But that varied by election and varied by people. The parties were usually——personnel were usually picked by——well, we may have been divvied up by group leaders, but they would have been picked by either candidates or other individuals.

Q. Well, you say divvied up by group leaders. I wonder, are you familiar—— Well let me ask you this:

Describe in particular the process by which the candidates for the 1995 spring student government election were selected.

A. As best I can recall, the——that particular agreement was a kind of a superdeal. It involved the Gator Growl producer, the Homecoming general chairman, the student body president, vice-president, and treasurer slates. Student traffic court was in there. And then the party chairman and the associate party chairs would have been there too.

Q. Now, you in effect were the head——or were you in

senate president, which was traded for student body treasurer. And we got Blue Key president, I believe, was in that same deal, for Chris Nash.

Q. And can you recall what the other groups got on——in connection with that 1995 deal.

A. Spe-Delt would have gotten vice-president, Alpha-Delt would have gotten general chairman——

Q. Of Homecoming?

A. ——of Homecoming.

Alpha-Delt also got senate president in the trade from my group.

Q. You haven't mentioned Gator Growl?

A. Gator Growl went to our group; Gator Growl producer went to our group. But then——

Q. Now, who was the——who was the president candidate for the 1995 spring student government election?

A. Kevin Mayeux for spring of '95.

Q. Now, at the time, what was your official position with student government; that is, at the time this deal was made?

A. I was student body president at the time.

Q. And what connection did you have with the actual running of the——of the campaign after this deal had been made?

A. Very little. My key involvement was after the deal

had been struck, that our group received the senate president. I——I traded that with Alpha-Delt to receive student body treasurer for my fraternal brother. And other than that——my fraternity brother, Paul Koukos.

And other than that, the campaign, as far as I know, went well: They won.

Q. Yes. And why was it——was there some reason that you weren't more actively involved in the campaign perhaps?

A. Heavily involved in setting up telephone registration at the time with the university.

My term had been extended by two months by the student senate, so that created a lot more work to do than would have otherwise been going on.

We were also very involved in the session; that's when there's just a huge debate at the state level over the budgets for the universities, differential tuition for the universities, and those types of issues.

Q. And when you refer——

A. And I was in law school.

Q. When you refer to the session, you're referring to the session of the Florida legislature?

A. Yes, that's correct.

Q. Okay. Now, once the candidates have been selected, through the process you mentioned or otherwise, what role, if any, do the group leaders and the house and group system have

in supporting the election of the candidates?

A. They encourage their——our members to vote. And we try to turn out the vote, be it the fraternity or sorority or the band or student organization.

And each tries to turn out at many people to vote and support the ticket, to avoid a runoff, to try to get, you know, over 50 percent of the vote on the first shot.

Q. And in the tapping process, what role does this supporting of candidates have in the evaluation of candidates ——of candidates for Florida Blue Key?

A. Well, I mean, I think people obviously support the people that support them. So those houses or organizations that support candidates generally do better in the tapping process than those who do not.

Q. Do you know a man by the name of Peter Vlcek?

A. Yes.

Q. Do you recall when you first met Peter Vlcek?

A. I would say that I probably met Peter either fall of '88, when I ran with the Express party, or in fall——or by certainly by spring of '89 I met Peter.

Q. Was the Express party a party that was selected through the process you've described?

A. No. No, sir. Express was the party of the current student body president at the time, which was Scooter Willis, and involved Debbie Wasserman, who is now Debbie Wasserman

Q. Now, you were in Pi-Tau, as your group, is it not?
A. Yes, sir.
Q. What were the entities or groups that were in Pi-Tau?
A. At the time——and this is to the best of my recollection——it would have been Alpha Gamma Rho; Phi Kappa Tau fraternity; Tau Kappa Epsilon; Delta Gamma sorority; Kappa Kappa Gamma fraternity, which is of course a sorority; Pi Kappa Phi fraternity; Alpha Gamma Rho——I meant my fraternity; Xi Omega sorority. There may——I——that would be my recollection.
Q. They were all fraternity houses or sorority houses that you've just named?
A. That's correct.
Q. Did each of those fraternity or sorority houses have a member who was a representative at Pi-Tau?
A. Yes.
Q. Were each one of the representatives members of Blue Key?
A. Yes. General——well, Pi-Kap was what's called tapped out at one point; they didn't have any members. So we would have been working with whoever, you know, there——possibly their president. But I don't know if that was during this timeframe.
But generally speaking, yes, they would all have members that were members of Blue Key; that's correct.

Q. So in the——in your supergroup of Pi-Tau, to the best of your knowledge, there were no members who were not members of Blue Key?

A. Well, I mean, it's an odd question. Everybody——you know, everybody within a house would be considered in the——a member of the group. And naturally all those people were not members of Blue Key at the time.

Q. Okay. So——

A. A house is a member; not an individual. I——I was—— you know, do you understand what I mean?

Q. Yes; you were sort of a representative for a house?

A. That's correct.

Q. So what you had was a large number of fraternity and sorority houses who had banded together into Pi-Tau to further or advance their interests at the University of Florida?

A. That's correct.

Q. Now, sir, were there ever other entities who were members of any of these groups, such as the University of Florida marching band?

A. Yes, they were for a time period from——and I cannot pinpoint whether it was during this incident in 1995. But the band was a member of Supergroup for a period of time.

Q. And was the Black Student Union——was it a member of the power group?

A. Of a group, yes.

Q. And the International Student Association, was it a member of a power group?

A. Voluntary——Volunteers for International Student Affairs, yes, sir.

Q. And what's the name of the entity that represents housing, independent housing, at the University of Florida?

A. Inter——Interresidence Hall Association.

Q. Okay. And that's the association that everybody who lives on campus at the University of Florida belongs to?

A. Yes. Some are more active than others, but yes.

Q. Okay. Was it a member of one of these power groups?

A. During the timeframe that I was at the University of Florida, yes. But again, I cannot be date-specific.

Q. Okay. Can you name some other entities that——such as the ones I've just suggested to you, who were members of power groups, but who were not fraternities or sororities?

A. The Hispanic student association was probably——was represented at one point in time. Different independents worked together.

As far as overall organizations, I think you've covered——those were the ones we discussed the last time. I think that covers most of them, if not all of them.

Q. Now, someone like Peter Vlcek, he was an independent; was he not?

A. Yes, to my knowledge, he was.

Q. And John McGovern, who just the other day was elected student body president of the University of Florida, he also was an independent; was he not?

A. Was and is, as far as I know.

Q. Do you know Tony Vu, who was a prior defendant in this suit?

A. Yes.

Q. Was Tony Vu an independent?

A. Yes, that is correct.

Q. Do you know Hwang Vu who has been mentioned in this suit?

A. Yes.

Q. Was he also an independent?

A. Yes, he and Tony were both Alpha-Delt independents. I believe. I believe.

Q. So in various power groups there were as well, seeing as we can recount four of them just sitting here, various individuals who aren't members of any fraternity or any sorority?

A. That is correct.

Q. Or for that matter, any type entity that you've described thus far?

A. That's correct.

Q. Now, who were the people that got together and made this deal, to your personal knowledge, in the spring of 1995?

And tell us how you know that they did this.

A. Well, representing Pi-Tau at the time was——should have been Karl Liebman and Ken Nanni. They were the ones who came back to the group and discussed the deal. So they——

Q. Were you there when they came back to the group to discuss the deal?

A. Yes.

Q. Okay. But you were not at the meeting when this, quote, "deal" or agreement, was struck?

A. I don't recall being at that meeting, no. I recall being at the meeting for '96, but not for this one.

Q. And——

A. And for previous meetings.

Q. Now, I want to direct your attention to your particular candidacy.

A. Yes, sir.

Q. How did you determine that——or how did you decide to run for student body president?

A. In spring of 1992, I was elected senate president. And after serving for budget chair for a couple of——two years, and at the end of my term, in at that point in fall, I believe, I took over as judiciary chair and evaluated running for president then.

And decided to work with Alex Patton, who approached me to run as his student body treasurer candidate, and ran at

that point.

And at that point had decided, and let it be known, that I was running for student body president in spring of '94.

Q. Who was your running mate?

A. My vice-president was Bobby Dubose. My treasurer was Brian Siemienas.

Q. And how was your vice-president selected?

A. He came via Spe-Delt and the Black Student Union. He was——he was a member of Spe-Delt because of his fraternity; not because of the Black Student Union.

Q. Did——my question, though, is how did you——how was he selected to work with you?

A. He was selected by that group. We worked with them just like we worked with Mayor's Council and Family Housing and other organizations to put together a slate to win.

And we had either the highest or second highest percentage of votes ever, depending on how you look at it.

Q. You had not been selected by a power group before you announced, had you, sir?

A. That's correct. I mean, I had this——I had support within my group at the time I determined I was going to run. But the——I was running regardless, as we discussed before.

Q. Okay. So you made the decision, and not——no one in any power group named you to any——anything here?

A. For student body president, you mean?
Q. Yeah.
A. (No response.)
Q. The decision——not some power group making any decision.
A. Right.
Q. You had not been selected by a house system before you announced, had you?
A. No. I mean, before I——by the time we declared and threw out the T-shirts, I had gained the support of numerous houses and individuals.

But at the time that I made the determination to run, which was during my term as treasurer, no.

Q. Okay. And you had not been supported by any supergroup or any of these groups you've described to us before you announced your selection——or your candidacy?
A. Well, by the time that I announced officially and threw out the T-shirts, we had——we had support from all the different factors of campus.

But determined——when I determined to run while I was student body treasurer, that was a determination that I made with Mr. Siemienas and fraternity brothers and friend and people in other houses, some of which would have been in groups and some of which wouldn't have been.

Q. Now, did you put together a group or body of

supporters, different various organizations, to assist you in your campaign?

A. Oh, yes, of course.

Q. Who did you utilize in your campaign as your main avenues of support?

A. We got a lot of Greek support. But we got support from the Mayor's Council, which represents Family Housing. We got support from numerous other student organizations both representing sports clubs, representing different——the different organizations representing different groups of students, international students, the Black Student Union, the Hispanic Student Union.

We approached, you know, all the houses and the groups which supported us, and all the individuals——all the other organizations on campus, the same manner.

Q. Now, after you had announced and started your campaign, did the group or house system elect, or select rather, anyone to run against you?

A. No. No.

Q. What was the name of the political party that you ran under?

A. We ran as SUN, Students Unite Now, party.

(WHEREUPON, discussion was had off the record.)

BY MR. ROSCOW:

Q. Who formed the SUN party?

A. Who actually——you mean, who actually filed the paperwork? I'd have——I'd have to look.

I——I formed that in consultation with, again, a number of friends, fraternity brothers, people who had been previous student body president.

And I had been a member of the SUN party back in 19——fall, I believe, of 1989, when it was a party that was created by Ed Scales, and/or who was the current student body president at the time.

Q. Had it gone out of vogue, so to speak?

A. It——it——well, yeah, if you want to——if vogue is how you want to look at it, it——it ended with the election of, I believe, Mike Brown in spring of 1990.

Q. So what you did was resurrected the name of this party?

A. Yes. Yes. Which happens a lot.

Q. And were you the one that was instrumental in selecting the name of the party?

A. Yes. I mean, I guess so. We considered that. We considered Beach, which was a party run back in 1985 or '86. We considered——just a number of parties. And that's the one that I settled on, and that's the one that we got the logo done for and everything else.

Q. Once you settled on the name of the party——

A. Uh-huh.

Exhibit 1D: Testimony from Jacelyn Lee Speer, a house representative from Alpha Delta Pi that collaborates Florida Blue Key's involvement in Student Government

https://www.scribd.com/document/29136212/Speer-Testimony

A. It will continue to be this address.

Q. My next question is: Are you a college graduate?

A. I'm a graduate from the University of Florida.

Q. My next question is: What part, if any, did you take in the 1995 University of Florida student government election?

A. During the spring of 1995 for the University of Florida student government elections I was one of the representatives of the University of Florida chapter of the Alpha Delta Pi sorority for the Focus Party.

Q. My next question is: What was the relationship of the Focus Party and Florida Blue Key in that election?

A. To the best of my observations of who was involved in the Focus Party and my personal knowledge about student politics at the University of Florida campus, that the Focus Party was very closely tied to Florida Blue Key.

Q. My next question is: What knowledge did you have of John McGovern at that time?

A. At that time I was personally acquainted with John McGovern, who I believe to be a party in

Exhibit 1E: Testimony from Caroline Montanus, a member of Kappa Kappa Gamma, on how Student Government positions are distributed among the Greek houses within the group/house system

https://www.scribd.com/document/29135577/KKG-Testimony

sorority, Kappa Kappa Gamma, because I wanted to make the world a little smaller and have a core group of people and get involved and things like that. So I joined the Greek system and Kappa Kappa Gamma, that specific house within the system.

Q. While you were a member of Kappa Kappa Gamma were you at any time a member of what's been categorized here at this trial as a group?

A. Yes.

Q. What was the name of the group that you were in?

A. Pi Tau.

Q. And did you serve as the representative for Kappa Kappa Gamma at any time?

A. I can't -- there was -- I think there was always someone who was my senior that was in Blue Key that was also a Kappa Kappa Gamma but I would be a representative. I'd go to the meetings but sometimes I don't know if I was, like, the head person. I think that might have been Terry, another girl in my sorority.

Q. Did you attend group meetings during the course of your tenure at the University?

A. Yeah, we would have -- before or after a Blue Key meeting sometimes our group would meet to discuss -- usually they'd ask you, well, you know, what are your

girls, meaning other girls in your sorority, are they interested in joining this group or that group on campus, do they want to be involved in Homecoming or Gator Growl. And you would go back to your house before meetings and ask who wants to get involved and they would say, oh, I would like to be involved in Gator Growl, I'd like to be involved in Homecoming or divisions which, I don't know, it's this part of Blue Key where we sponsor different things like a debate tournament and we sponsored a charity, a group that does charity work.

So if they want to do something like that they come and tell me. Then I would go to the meeting and say, well, I've got three freshmen who would like to be on a committee for Gator Growl and maybe two sophomores or juniors who want to be an assistant director for a Homecoming pageant or something like that. Then they would come back and tell you, well, we have room for something like this, would you be interested. And it will go -- that would be basically the topic of these meetings.

Q. What official positions have you held with Florida Blue Key?

A. I was assistant treasurer starting fall of 1994 and then I was the treasurer from the spring, all spring 1995 and fall 1995.

Q. Actually I guess I never really asked you, when

Exhibit 1F: Affidavit from Clay Martin that affirms Florida Blue Key's historical role in Student Government and the mechanics of the group/house system that supports the FBK-backed party

https://www.scribd.com/document/29136840/Clay-Martin-Affidavit

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA

CHARLES GRAPSKI,
Plaintiff,
vs.

CASE NO. 95-4412-CA
DIVISION K

PETER BENES VLCEK, JOHN McGOVERN,
TONY VU and FLORIDA BLUE KEY, INC.,

Defendants.
_____/

FILED
97 SEP -4 AM 10:56
CLERK OF CIRCUIT COURT
& COUNTY COURT
ALACHUA COUNTY, FL

AFFIDAVIT OF CLAY MARTIN

I, CLAY MARTIN, swear and affirm on the basis of my personal knowledge and belief that the following statements are true and correct:

1. My name is Clay Martin.

2. I reside at 1014 N.W. 16th Street, in Gainesville, Florida.

3. I am a 1997 graduate of the University of Florida College of Law.

4. In the fall of 1996, I was a student at the University of Florida and a member of Florida Blue Key (FBK).

5. I am aware that FBK substantially participates in the election of University of Florida Student Government officers through the operation of the FBK group system.

6. In the fall of 1996, I was well acquainted with Chris Nash, at that time the Group Leader in the FBK group that included the fraternity to which I belonged.

7. In the fall of 1996, I accompanied Chris Nash to a FBK Group Leader meeting that had been convened to resolve a dispute about who would be on the slate

of candidates to be backed by the FBK group system in the upcoming Student Government election for members of the student senate.

8. The President of FBK is an elective office of FBK and as such is filled by a vote of the active members of FBK.

9. University of Florida Homecoming and Gator Growl are primarily organized and sponsored by FBK, and as such the positions of Homecoming General Chairman and Gator Growl Producer are filled by active members of FBK.

10. During the course of the Group Leader's meeting I referred to above, the FBK President, the Homecoming General Chairman and the Producer of Gator Growl entered and actively participated in the meeting in an attempt to resolve a dispute over the slate of candidates to be backed by the FBK group system in the election.

11. Peter Vicek was present at the meeting I have referred to in this Affidavit.

12. In my experience, Peter Vicek always aggressively participated in Student Government elections to back the slate of candidates supported by the FBK group system.

13. The meeting I have referred to in this Affidavit was conducted on the evening of September 12, 1996, in the conference room of the J. Wayne Reitz Union Student Activities Center.

14. The exact purpose of the meeting was to create the structure of the Equity party for the fall 1996 University of Florida Student Government elections.

15. The Equity Party was the party backed by the FBK group system in the fall 1996 University of Florida Student Government elections.

16. The structure of the party includes selecting persons to fill positions such as the party chairman and associate chairs (or vice-chairs), party spokesperson, and other party positions.

17. The people in attendance were John McGovern (Spe Delt Group Leader), Chris Nash (Alpha Delt Group Leader), Greg Weiss (Supergroup Group Leader), and Ken Nanni (Pi Tau Group Leader).

18. All these Group Leaders were FBK members.

19. Also present at the meeting were Matt Schickle (Spe Delt), Clay Martin (Alpha Delt), Brent Gordon (Alpha Delt), Vivian Quesada (Spe Delt and FBK Fall 1996 President), and Peter Vicek.

20. The reason these persons attended was to assist the Group Leaders in creating the party structure.

21. All these people were also FBK members.

22. At one point during the meeting, Jamie Todd Foreman (1996 Homecoming General Chair) and Adam Hall (1996 Gator Growl Producer) entered the room and urged the Group Leaders to get the selections over "peacefully" because the politics of the Student Government campaign and the tension between the FBK groups were affecting the morale of the Homecoming and Gator Growl directorates and staffs.

23. Hall and Foreman were FBK members at this time.

24. In my experience, FBK routinely supported a FBK group system backed party in each University of Florida Student Government election.

25. After the meeting referred to herein, I participated in the FBK evaluation

committee and voted in FBK tapping but thereafter dropped out of FBK activities.

I have nothing more to say.

CLAY MARTIN

STATE OF FLORIDA
COUNTY OF BRADFORD

Before me appeared CLAY MARTIN who (is personally known to me or identified herself with a current driver's license), and who took an oath, and subscribed this Affidavit on the 3rd day of September, 1997.

Karen T. Shealy

NOTARY PUBLIC

Name of Notary typed, printed or stamped

My commission expires:

Karen T. Shealy
MY COMMISSION # CC577759 EXPIRES
September 20, 2000
BONDED THRU TROY FAIN INSURANCE, INC.

Exhibit 1G: Court documents of notice and denial of appeal from Defendant John McGovern and order of pending motions

https://www.scribd.com/user/23253328/thefineprint

IN THE CIRCUIT COURT OF THE
8TH JUDICIAL CIRCUIT IN AND FOR
ALACHUA COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 95-4412-CA-K

RECORDED IN OFFICIAL RECORDS
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ALACHUA COUNTY, FLORIDA
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CLERK OF CIRCUIT COURT
ALACHUA COUNTY, FL

CHARLES GRAPSKI,

Plaintiff,

v.

PETER BENES VLCEK, JOHN McGOVERN, TONY VU and FLORIDA BLUE KEY, INC.,

Defendants.

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Defendant/Appellant, John McGovern ("McGovern"), pursuant to Fla.R.App.P. 9.110, appeals to the District Court of Appeal, First District of Florida, (1) the Final Judgment of this Court rendered in favor of the Plaintiff on December 14, 1999; (2) this Court's order on Defendant McGovern's post-trial motions dated September 21, 1999, *i.e.*, Order on Defendant John McGovern's Amended Motion for New Trial and Alternative Motion for Relief from Judgment, Motion for New Trial, Motion for Directed Verdict, and Amended Motion for New Trial and Alternative Motion for Relief from Judgment, Decree, Order or Proceeding (Newly Discovered Evidence); and (3) this Court's Order on Pending Motions rendered December 14, 1999.

June G. Hoffman

Steven E. Stark
Fla. Bar No. 516864
June Galkoski Hoffman
Fla. Bar No. 050120
FOWLER, WHITE, BURNETT, HURLEY,
BANICK & STRICKROOT, P.A.
NationsBank Tower, 17th Floor
100 Southeast Second Street
Miami, Florida 33131
Telephone: (305) 789-9200
Facsimile: (305) 789-9201

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CASE NO. 95-4412-CA-K

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this 7th day of January, 2000 via U.S. mail upon Robert C. Widman, Esq., Morris & Widman, P.A., 245 No. Tamiami Trail, Suite E, Venice, FL 34285; Joseph W. Little, Esq., 3731 N.W. 13th Place, Gainesville, FL 32605 and John F. Roscow, III, Esq., Scruggs & Carmichael, P.A., P.O. Box 23109, Gainesville, FL 32602; Mr. Peter Benes Vlcek, P.O. Box 23462, Jacksonville, FL 32241.

June Hoffman
June G. Hoffman

[jgh] W:\50267\NOTAPP15.JGH

OFFICIAL RECORDS INSTRUMENT # 0001655243 12 pgs

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA

CHARLES GRAPSKI,

Plaintiff,

vs.

CASE NO. 95-4412-CA
DIVISION "K"

PETER BENES VLCEK;
JOHN McGOVERN; TONY VU;
and FLORIDA BLUE KEY, INC.,

Defendants.
_____/

FINAL JUDGMENT

THIS ACTION having come before the Court for entry of Final Judgment based upon the Verdict entered April 16, 1998, and the Court having considered Plaintiff's Notice of Acceptance of Remittitur based upon the Court's Order of September 21, 1999, it is hereby

ORDERED AND ADJUDGED, as follows:

1. Plaintiff, CHARLES GRAPSKI, shall recover damages from Defendant, JOHN McGOVERN, in the principal amount of $150,000, less his settlement with FLORIDA BLUE KEY, INC. of $82,419.75 ($85,000 less costs of $2,580.25), leaving a net amount of principal of $67,580.25 to be recovered in this judgment

2. Furthermore, Plaintiff, CHARLES GRAPSKI, shall recover prejudgment interest from Defendant, JOHN McGOVERN, in the amount of $15,145.13. Said sum is calculated, as follows:

$150,000.00 at 10% from 4/16/98 (date of Verdict) to 10/5/98 (date of dismissal of claims against co-Defendant, FLORIDA BLUE KEY, INC., on damage settlement of $82,419.75 with said co-Defendant)($41.09 per diem for 173 days)

$ 7,109.59

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$67,580.25 at 10% from 10/6/98 to 12/14/99 ($18.51 per diem for 434 days) 8,035.54

Total Prejudgment Interest through 12/14/99 $15,145.13

4. FURTHERMORE, Plaintiff, CHARLES GRAPSKI, shall recover costs in the amount of $ 883.00.

5. Plaintiff CHARLES GRAPSKI is entitled to the sum of $67,580.25 damages, $15,145.13 prejudgment interest, and $883 costs, equaling $83,608.38.

6. FURTHERMORE, Plaintiff, CHARLES GRAPSKI, shall have deducted from the foregoing total sums in computing his judgment one-half the cost of providing the trial transcript for post trial proceedings, which amount is one-half of $5456, equaling $2728.00

7. Based upon the above, Plaintiff, CHARLES GRAPSKI, shall recover from Defendant, JOHN McGOVERN, a total sum of $80,880.38 (Eighty thousand eight hundred eighty and 38/100 dollars) for which let execution issue.

DONE AND ORDERED in Chambers, at Alachua County, Florida, this 14 day of December, 1999.

Circuit Judge

Copy

OFFICIAL RECORDS INSTRUMENT # 0001655243 12 pgs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a copy of the foregoing, has been furnished, by mail or hand delivery to **MR. PETER BENES VLCEK**, P. O. Box 23462, Jacksonville, FL 32241; **STEVEN E. STARK, ESQ.**, 100. S.E. Second Street, 17th Floor, Miami, FL 33134, **ROBERT C. WIDMAN, ESQ.**, 245 No. Tamiami Trail, Suite E, Venice, FL 34285, and **JOSEPH W. LITTLE**, ESQ., 3731 N.W. 13th Place, Gainesville, FL 32605, on this 14 day of December, 1999.

_____
Judicial Assistant

c:\wp5\graps\fIG9912.014

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT,
IN AND FOR ALACHUA COUNTY, FLORIDA.
DIVISION "K"

CHARLES GRAPSKI,

Plaintiff,

CASE NO. 95-4412-CA

vs.

PETER BENES VLCEK, JOHN McGOVERN,
TONY VU and FLORIDA BLUE KEY, INC.,

Defendants.

ORDER ON DEFENDANT JOHN M. McGOVERN'S "AMENDED MOTION FOR NEW TRIAL AND ALTERNATIVE MOTION FOR RELIEF FROM JUDGMENT", MOTION FOR NEW TRIAL, MOTION FOR DIRECTED VERDICT, AND "AMENDED MOTION FOR NEW TRIAL AND ALTERNATIVE MOTION FOR RELIEF FROM JUDGMENT, DECREE, ORDER OR PROCEEDING (NEWLY DISCOVERED EVIDENCE)

THIS CAUSE came on for consideration upon the above-named post trial motions of the Defendant, JOHN McGOVERN. This Court as a substitute trial judge has carefully reviewed the entire trial transcript, the memoranda of law submitted by the parties, and having received argument of counsel in which this Court is fully advised , it is

ORDERED and ADJUDGED as follows:

1. Defendant McGOVERN's "Amended Motion for New Trial and Alternative Motion for Relief from Judgment, Decree, Order or Proceeding" is denied. The "newly discovered evidence" in the form of Defendant VLCEK's post-trial affidavit and deposition is insufficient and does not reach the level of the legal standard for newly discovered evidence.

2. Defendant McGOVERN's "Motion for New Trial, Motion for Directed Verdict and Amended Motion for New Trial and Alternative Motion for Relief from Judgment, Decree, Order or Proceeding" is denied in part but granted as to the Motion for New Trial on the issue of damages, should Plaintiff not accept the remittitur as found by this Court.

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The verdict of the jury was for $250,000.00. There was no specific evidence as to the issue of damages except for the specific nature of the defamation; however, the review of the entire trial proceeding clearly demonstrates that the amount awarded is excessive and indicative of prejudice, and passion on the part of the jury. The theory of the case by the Plaintiff as evidenced by the trial record, clearly shows an effort to connect defendant JOHN McGOVERN and FLORIDA BLUE KEY. The closing argument of Plaintiff's counsel in seeking to invoke the "community conscience" was improper and coupled with the biblical reference raised the passion and prejudice against these defendants such that the damage award from this jury was to send a message to the community and not to compensate the Plaintiff for his damages. Consequently, the damage award was not based on the facts of the case but instead passion and prejudice against the defendants. Although this issue as well as others raised by defendant, JOHN McGOVERN, in his Motion for New Trial, do not reach the level requiring a new trial, certainly demonstrates the theory of prosecution of the claim of the Plaintiff which when coupled with the closing argument of counsel convinces this Court that the damage award was not made based on the facts and evidence but rather passion and I believe prejudiced argument that the jury should "speak for the community."

The Plaintiff's counsel properly argued for damages using the $150,000.00 figure and this Court finds that the additional $100,000.00 was due to the passion of this jury to "speak for the community and punish the defendants" as improperly argued by the Plaintiff's counsel. The appropriate damages award would be $150,000.00. Therefore, this Court grants the Motion or New Trial unless the Plaintiff is agreeable to the remittitur.

DONE and ORDERED this 21st day of September, 1999.

ELZIE S. SANDERS, CIRCUIT JUDGE

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Order has been furnished by regular U.S. Mailon September 21, 1999, to:

JOSEPH H. LITTLE, ESQUIRE
3731 NW 13TH PLACE
GAINESVILLE, FL 32605

JOHN F. ROSCOW, III, ESQUIRE
P O BOX 23109
GAINESVILLE, FL 32602

STEVEN E. STARK, ESQUIRE
MICHAEL N. KREITZER
100 S.E. 2ND STREET, 17TH FLOOR
MIAMI, FL 33134

PETER B. VLCEK
POST OFFICE BOX 23462
JACKSONVILLE, FL 32241

JONATHAN F. WERSHOW, ESQUIRE
P O BOX 1260
GAINESVILLE, FL 32602

Sharon L. Coston

Sharon L. Coston, Judicial Assistant

OFFICIAL RECORDS INSTRUMENT # 0001655243 12 pgs

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA

CHARLES GRAPSKI,

Plaintiff,

vs. **CASE NO. 95-4412-CA**
DIVISION "K"

PETER BENES VLCEK;
JOHN McGOVERN; TONY VU;
and FLORIDA BLUE KEY, INC.,

Defendants.
_____/

ORDER ON PENDING MOTIONS

THIS ACTION having come before the Court for hearing on November 30, 1999 on several pending motions, including Defendant McGovern's Motion for Clarification, McGovern's motions to strike Plaintiff's motion to disqualify Judge Booth, Defendant McGovern's motion to assess the cost of obtaining a trial transcript upon the Plaintiff Grapski, and Defendant McGovern's motion to enter an offset in the computing the final judgment against Defendant McGovern in the amount Defendant Florida Blue Key, Inc. paid Plaintiff Grapski in a damage settlement filed on October 5, 1998 and objections to Plaintiff's proposed judgment; and Plaintiff Grapski's motion for an award of costs; and, having read the submission of the parties, and having heard from counsel in oral argument, it is therefore ,

ORDERED AND ADJUDGED, as follows:

1. Defendant McGovern's motion to strike Plaintiff Grapski's motion to disqualify Judge Booth is DENIED.
2. Defendant McGovern's motion to assess Plaintiff Grapski the cost of acquiring a transcript of the trial for the purposes of ruling on Defendant

OFFICIAL RECORDS INSTRUMENT # 0001655243 12 pgs

McGovern's post-trial motions for new trial and for remittitur is GRANTED, but only to the extent that one-half of said cost shall be deducted in the computation of the sum to be included in the final judgment. The Court finds that in order to rule on McGovern's post-trial motions it was required to review the trial transcript as a result of the plaintiff's motion seeking disqualification of Judge Booth and that based upon the review of the transcript and the record and its rulings thereon granting McGovern relief, in part, an award of one half the costs of the transcript against the plaintiff is appropriate.

3. Plaintiff Grapski's motion for an ward of costs is GRANTED, in part, and denied, in part. The court finds that taxable costs of $883.00 are recoverable and that said amount shall be included in the computation of the sum to be included in the final judgment.

4. Defendant, McGovern's motion to award an offset against Plaintiff, Grapski's final judgment in the amount of the sum of $85,000 paid by former Defendant, Florida Blue Key, Inc. is GRANTED, except one-half of the sum certified in Plaintiff Grapski's cost petition in the total amount of $5160.51 shall be deducted therefrom, said one-half being $2580.25, leaving a net offset in the amount of $82,419.75 to be deducted as of October 6, 1998.

5. That McGovern's objections to the award of interest on the remitted jury award based on the argument that the amount recoverable was not liquidated until the Court ruled on post -trial motions and plaintiff accepted remittitur in lieu of a new trial on damages, is DENIED. The Court finds that

OFFICIAL RECORDS INSTRUMENT # 0001655243 12 pgs

the amount recoverable became liquidated as of the date of its ruling on post trial motions and acceptance of remittitur, but that interest on the remitted amount, less the deductions as of October 6, 1998 noted above with respect to the amounts received from Florida Blue Key, will run from the date of entry of the verdict.

6. That the Court defers ruling on McGovern's motion for clarification as it relates to the effect of the pending claims against defendant, Vlcek, on the claims against McGovern and McGovern's rights with respect to that pending claim against Vlcek, as well as plaintiff's motion seeking a status conference/ order setting trial as to the claims against Vlcek. To the extent not otherwise addressed herein the remainder of McGovern's Motion for Clarification is denied as moot.

DONE AND ORDERED in Chambers, at Alachua County, Florida, this 14th day of December, 1999.

Circuit Judge

OFFICIAL RECORDS INSTRUMENT # 0001655243 12 pgs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a copy of the foregoing, has been furnished, by mail or hand delivery to **MR. PETER BENES VLCEK**, P. O. Box 23462, Jacksonville, FL 32241; **STEVEN E. STARK, ESQ.**, 100. S.E. Second Street, 17th Floor, Miami, FL 33134, **ROBERT C. WIDMAN, ESQ.**, 245 No. Tamiami Trail, Suite E, Venice, FL 34285, and **JOSEPH W. LITTLE**, ESQ., 3731 N.W. 13th Place, Gainesville, FL 32605, on this _____ day of December, 1999.

_____
Judicial Assistant

c:\wp5\graps\fiO912.014

Exhibit 1H: Verdict by jury that found John McGovern and Florida Blue Key liable for defaming and conspiracy to defame Charles Grapski

https://www.scribd.com/doc/29133476/Verdict

IN THE CIRCUIT COURT OF FLORIDA, EIGHTH JUDICIAL CIRCUIT,
IN AND FOR ALACHUA COUNTY

CHARLES GRAPSKI,

Plaintiff,

-vs-

PETER BENES VLCEK,
JOHN McGOVERN, TONY VU, and
FLORIDA BLUE KEY, INC.,

Defendants.
_____/

CASE NO. 95-4412-CA

DIVISION: "K"

FILED IN OPEN COURT
April 14, 1998
D.C.

VERDICT FORM

PLEASE CIRCLE ONE OF THE ANSWERS IN QUESTIONS 1 THROUGH 4 (answer all four questions):

Direct Defamation

1. We the jury find that John McGovern (did) (did not) defame Charles Grapski.

2. We the jury find that Florida Blue Key (did) (did not) defame Charles Grapski.

Defamation by Conspiracy

3. We the jury find that John McGovern (did) (did not) defame Charles Grapski through a conspiracy.

4. We the jury find that Florida Blue Key (did) (did not) defame Charles Grapski through a conspiracy.

IF YOU ANSWERED "DID NOT" TO ALL OF THE FOREGOING QUESTIONS, THEN YOU HAVE FOUND FOR BOTH DEFENDANTS AND YOU SHOULD SIMPLY SIGN THE VERDICT FORM AND RETURN IT TO THE BAILIFF.

IF YOU ANSWERED ANY ONE OF THE FOREGOING QUESTIONS "DID", THEN YOU MUST ANSWER THE FOLLOWING QUESTIONS:

Exhibit 1I: Florida Blue Key dismissed out of court after settling with Charles Grapski for $85,000

https://www.scribd.com/doc/29138504/Dismissal

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA

CIRCUIT COURT CLERK
J.K. "Buddy" Irby
ALACHUA COUNTY, FL
Date 12/10/1998 07:49
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Book/Page 2206[illegible] 82

CHARLES GRAPSKI,

Plaintiff,

vs.

CASE NO. 95-4412-CA
DIVISION "K"

PETER BENES VLCEK;
JOHN McGOVERN; TONY VU;
and FLORIDA BLUE KEY, INC.,

Defendants.
_____/

98 DEC -8 PM 3:58

CLERK OF CIRCUIT COURT
ALACHUA COUNTY FL.

ORDER DISMISSING FLORIDA BLUE KEY, INC. WITH PREJUDICE

THIS ACTION came before the Court on the joint motion of Plaintiff Grapski and Defendant Florida Blue Key, Inc. to dismiss Florida Blue Key, Inc., and only Florida Blue Key, Inc., from this action with prejudice. Having found that this motion is unopposed, having determined that Plaintiff Grapski and Defendant Florida Blue Key, Inc. have reached a settlement between themselves and only between themselves, and having determined that Plaintiff Grapski and Defendant Florida Blue Key, Inc. have filed a copy of a detailed released executed by them and their lawyers to set out the terms of the settlement, a copy of which is attached to this order, it is hereby ORDERED and ADJUDGED, as follows:

Defendant Florida Blue Key, Inc., and only Defendant Florida Blue Key, Inc., is dismissed with prejudice from this action. The extent to

0001108

which any other person's or parties' liability to Grapski will be affected by said release will be determined in subsequent proceedings pursuant to applicable Florida law.

DONE AND ORDERED at the Alachua County Courthouse, Gainesville, Florida, this 8th day of December 1998.

ELZIE S. SANDERS
Judge of the Circuit Court

Copies furnished to:

Robert C. Widman (Co-Counsel for GRAPSKI)
Morris & Widman, P.A.
245 North Tamiami Trail, Suite E
Venice, FL 34285

Joseph Little (Co-Counsel for GRAPSKI)
3731 N.W. 13th Place
Gainesville, FL 32605

Jonathan F. Wershow (Attorneys for FBK)
Wershow and Schneider, P.A.
P.O. Box 1260
Gainesville, FL 32602

John Roscow (Attorney for FBK)
P.O Box 23109
Gainesville, Fl. 32602

- **SET 2: Academic theses from Aubuchon (2005), Bradshaw (2013), and Arcenas (2025) establish Florida Blue Key's continued political dominance of the University of Florida Student Government after 1998 case (Exhibit 2A-2C)**

Academic research from 2005 to 2025 documents Florida Blue Key's continued dominance of the University of Florida Student Government after the 1998 Grapski defamation case through reforms into a complex three-bloc system composed of **fraternities, sororities, and multicultural organizations**. These theses coin the terms **'The System'** to describe the political machine and **'Independent movement'** or simply **'Indies**' to describe the cohesive political opposition against Florida Blue Key. The System is described as a 'fortress' that is built on personal affinity and social bonds between Greek house leaders, which ensures positions of power are divided among allies. Historically, the System was more divided among different factions or groups that formed a two-party system; however, the modern System unites under **one party** each election cycle to ensure continued political dominance. Crucially, the System's practice of **rebranding political parties** after they accumulate negative public attention via scandals is explicitly mentioned to maintain control.

Exhibit 2A: Excerpts from Aubuchon Thesis, FRAMING ANALYSIS OF THE 2004 STUDENT GOVERNMENT ELECTION AT THE UNIVERSITY OF FLORIDA IN A COLLEGE MEDIA SETTING of original factions of the 'Group System', voter blocs within Greek and multicultural organizations, low voter turnout, and identification of the 'Greek party'

https://ufdc.ufl.edu/UFE0012181/00001/pdf

Understanding UF's Student Government Structure

Student Government, much like the *Independent Florida Alligator*, is a permanent fixture on the University of Florida's campus. Although the two had been intricately intertwined throughout much of their history, the split in 1973 would allow for much differentiation between the two. Student Government at the University of Florida is a complicated affair; composed of three branches: Legislative, Judicial, and Executive. Containing a budget of roughly $11.4 million dollars, the Student Government system in place is very comprehensive.

Each of the main officials in Student Government, notably the Executive President, Vice-President, and Treasurer, along with all of the Legislative senators and Judicial Chancellor, are selected in periodical elections during the course of the academic year. The first election, held every fall semester, elects one-half of the senators to the

legislature. It typically has the lowest levels of participation, around 10-12% of the student body, and gathers very little media attention. The spring election, however, is a different matter entirely. The elections for executive office and their corresponding slates of candidates spend much more money and garner much more participation from the media and the student body (typically about 16-17%). This translates into a number of campaign rallies, debates, events, and a media storm attempting to garner student participation.

Overview of Various Voting Blocks

To provide further context for the 2004 Student Government election, it is necessary to describe the student body electorate. The voting turnout of the Student Government elections is defined by blocs of voters belonging to student organizations. The most well-known and considered influential of these blocs is the Greek fraternities and sororities within the Interfraternity and Panhellenic Councils. The Interfraternity and Panhellenic Councils (IFC/PC) are comprised of 39 Greek letter organizations on the University of Florida campus. With a total population of approximately 5,000 easily mobilized voters, it is often considered the dominant group in control of student government. In addition to the mostly white Greek councils, the blocs represented by the Black Student Union (BSU), Hispanic Student Association (HSA) and the Inter-Residence Hall Association (IHRA) are often considered major players within the Student Government campaigns. Each of these blocs typically work in tandem in alternating arrangements in order to battle for victory in these campaigns. In different years, they may or may not act as cohesive units in the campaign and may often split along factional lines. In these campaigns however, typically one will be defined as "the" Greek party with which most houses have aligned for the campaign. With a very high

success rate, nearly 18 out of the last 20 campaigns, the "Greek Party" usually claims victory.

The reason for this long streak of victory is formulaic: the Student Government campaigns are tightly run with the cycle continuing in the hands of a few who train their successors. In addition to the newly established "politicos" being hand selected, often times they hail from the same pattern of fraternities and sororities. This is not limited to the IFC/PC community, however. Many of the dominant factions within the other voting blocs typically matriculate in a similar pattern. These power players were usually the leaders in political "groups." The "Group System," as it was called throughout the past decades was comprised of four main groups, nicknamed "Pi Tau," "Alpha-Delt," "Sphi-Delt," and "Super Group." Each of these four groups had members from the IFC/PC and minority Greek systems with leaders chosen from within their ranks to represent them in Student Government and Florida Blue Key related decisions. While the names are comical in nature, these power groups were taken very seriously within the Student Government community. Each of these groups included factions within the dominant IFC/PC system as well as the successive minority communities involved in Student Government politics. These groups over the years battled outsiders to the system as well as each other in an attempt to re-establish control year after year to ensure that positions of power were equally divided into legacy positions as well as earned positions.

The Student Government election of 1996 was further thrown into disarray with a lawsuit between a presidential candidate and members of Florida Blue Key. Members of the organization doctored a factual police record of Charles Grapski which included two DUI charges and battery of a police officer to include child molestation charges. The

doctored record was then placed as the focus of a campaign flier and distributed in a small amount on campus. Because the students were members of Florida Blue Key and had used the materials of the organization to print the false flier, the organization was also charged in the lawsuit. The lawsuit concluded that Florida Blue Key was in fact heavily involved with Student Government and maintained that the organization established some amount of control over the system. This outcome encouraged successive members of the organization to distance themselves from Student Government and remove some of this influence that had existed for so many years.

After the lawsuit in the mid 1990s, the "Group System" was greatly weakened and brought to the brink of collapse. All of the organizations, from IFC/PC to BSU, HSA, and the like that once belonged to a particular group now found themselves in an environment of disarray. These fractionalized groups slowly began to work together and attempted to formulate once again in an attempt to keep the Student Government system together and ensure that these groups remained in power. Many of these groups now found themselves occupying "legacy" positions, leadership positions handed down to members within certain groups every year. These "legacy" positions are designed to maintain superiority in Student Government and ensure that a "chosen" candidate assumes dominance and is then placed in position as Student Body President.

Over the next couple of years, a clear "Greek majority" was usually found in some fashion. Constructed of a majority of Greek houses, the so-called "Greek Party" would continue to exert control year after year over Student Government campaigns and the placement into positions of authority.

The 2004 Student Government Presidential Election appears to have been a different and atypical campaign. Attention from the media and the student body was high with a subsequent run-off election voter participation reached 11,586 votes cast. This overall increase from the normal election equated to roughly 25% of the student population and was curious in the fact that a run-off election actually increased voter turnout rather than following the traditional model of decreasing.

The election included three political parties, Access, led by Jamal Sowell, Innovate, led by Scott Kennelly, and Keg, led by Travis Marsh. For consistency in the overall content analysis, only the Access and Innovate parties were consulted. Each of these two teams led a traditional campaign, complete with advertisements, platforms, and a full compliment of candidates. Keg was omitted because of the "joke" oriented campaign slogan of "win or lose, we booze" and the lack of legitimate campaign communications to analyze.

The Greek power monopoly would soon come to a crashing halt. The past dominance expected by the "Greek Party" in 2004, however, would prove not to be. In an attempt to further work as a cohesive unit, the 39 IFC/PC Greek organizations finally agreed to work in complete tandem under the Innovate Party banner. According to the *Alligator* newspaper article:

> "Innovate is just considered the Greek party," said Mike Maxim, President of Pi Kappa Alpha Fraternity, an IFC chapter. "If you say you're Greek, then you are pretty much going to vote Innovate – that's my impression of things." (Seawell, 2004a)

What seemed to be an arrogant mindset for the IFC/PC system however would quickly vanish with Access's Jamal Sowell winning with a 2,000 vote margin over Innovate's Scott Kennelly.

Exhibit 2B: Excerpts from Section 3: 'A fortress built bloc by bloc', Section 4: 'The Room', and Section 5: 'The strange double life of Florida Blue Key' of Part I of Bradshaw Master Thesis (Power, Patronage and Paternalism in the Gator Nation: Student Government at the University of Florida) on the terminology to describe the reformed bloc system (political bloc, social bloc, third bloc, and communities) as 'the System', horsetrading, party rebranding, and FBK tapping process

https://drive.google.com/drive/u/0/folders/1RAfaZyXBalJDMcbMYC51qxgRD0bjUVLC

David Bradshaw (UFID: [redacted])
Master of Arts in Political Science
November 2013: Final Paper I

3. A fortress built bloc by bloc

The System has historically been a coalition of the vast majority of the UF Greek community and several of the most prominent non-Greek student organizations on campus, many of which represent particular minority constituencies and are often labelled as "the communities". Among the most prominent of these organizations is the Black Student Union (BSU), the Asian American Student Union (AASU), the Hispanic Student Association (HSA), the Inter-Residence Hall Association (IRHA) and Volunteers for International Student Affairs (VISA), a network of twenty sub-organizations representing different ethnicities and cultures that have a significant presence at UF. All of these organizations have large memberships (and thus a large number of potential voters) and receive significant funding from Student Government.[14] Nonetheless, it is Greek houses that wield the most influence. Most of the Greek houses on campus are affiliated to one of four "councils": the largest of these are the Interfraternity Council (IFC), which currently includes 2300 members in 25 fraternities and is the fourth largest fraternity system in the country[15], and the Panhellenic Council, with 2500 members in 16 sororities.[16] Such dominance is by no means a new phenomenon: many alumni remember a similar state of affairs during their student days. For example, current US Senator Marco Rubio explained his lack of involvement in campus politics to the Orlando Sentinel in February 2013 by saying that during his UF career in the early 1990s "Student government… was largely dominated by fraternities and sororities, and I wasn't in a fraternity."[17]

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[14] Each of the organizations listed here received between $69,000 and $162,000 in the 2013-14 Student Organization budget. Source: University of Florida Student Government. "Budgets". http://www.sg.ufl.edu/GovernmentBranches/Executive/Finance/Budgets, accessed Oct 3rd 2013.
[15] Interfraternity Council. "About fraternities." http://www.ufifc.org/index.php?option=com_content&view=article&id=2&Itemid=3, accessed Oct 24th 2013.
[16] Panhellenic Council. "About Us." http://www.ufpanhellenic.org/index.php?option=com_content&view=article&id=47&Itemid=27, accessed Oct 24th 2013.
[17] Kassab 2013

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For many decades, political power among the Greek community has been diffused into several groups or blocs. According to Aubuchon (2005), there were four main groups during the 1990s, each consisting of a number of houses affiliated to IFC, PC and "minority Greek systems". The groups, nicknamed "Pi Tau," "Alpha-Delt," "Sphi-Delt," and "Super Group", would battle "outsiders to the system as well as each other in an attempt to re-establish control year after year to ensure that positions of power were equally divided."[18] Ben Meyers told me that to his knowledge the System was much more internally divided in those days than it is now, but there was not such a strong independent movement to challenge it. He pointed out that even Debbie Wasserman-Schultz, the current chairwoman of the Democratic National Convention and former UF Student Senate President who is often cited by indies as a heroine of their movement, was a member of IRHA when she was at UF in the 1980s, and was thus a part of the System rather than being an "independent" in the sense that such a term would be understood on campus today. According to Meyers, the battles in the 1990s and earlier were "fights within the Greek community, as opposed to fights between the Greek community and indies."[19]

A lawsuit in the late 1990s (the case of Charles Grapski, which I explore later in this work) brought significant public exposure to the workings of this covert System, causing it to weaken substantially. The defeat to Jamal Sowell in the 2004 election finally caused a fundamental restructuring of the System – since that defeat it seems to have become a much more robust coalition, united against the ascendant independent movement. Everyone I interviewed who had internal knowledge of the System agreed that its current iteration began in around 2005 – an assertion supported by an investigation conducted in 2012 by the *Independent*

[18] Aubuchon 2005, p. 29
[19] Author interview with Ben Meyers, Oct 2013

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Florida Alligator, the popular student-run daily newspaper at UF known more commonly as simply the *Alligator*.[20] That is not to say that different concentrations of power do not still exist within the System – on the contrary, new divisions in the System have formed in recent years and there continues to be a substantial amount of internal wrangling for superiority between the different groups (now internally referred to as "blocs") that have emerged post-2004, even if all sides are determined to resolve those differences internally by election season. According to Nick Stinnett, such divisions are probably inevitable: "It would be unmanageable for one house to control everybody... everyone else would be trying to pick them off."[21] As a result, power naturally diffuses so that no one fraternity or sorority enjoys unchecked power.

Even if this explanation goes some way towards logically explaining *why* blocs continue to exist within the System, it does little to explain *how* those blocs form. Why do particular houses choose to join with each other? According to Matt Michel, a UF Supreme Court Justice who has been involved with Student Government for over five years, the most likely explanation is that alliances are based on social bonds that gradually develop between the members of different houses:

> *"I think honestly most of it is just built on personal affinity between the individual leaders. If the people involved have a lot of interactions with another house, whether because they're physically near them or because they group up and have annual events... I think that when you have enough of those contacts going on over a sustained period of time, everybody involved just sort of gets into the mindset that 'we're with this group. We associate with house A, B, C.' And that translates over into 'Yes, of course, we will push for your candidates that you are putting out there because we know you're going to push for ours as well.'"*[22]

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[20] Flechas 2012
[21] Author interview with Nick Stinnett, Oct 2013
[22] Author interview with Matt Michel, Oct 2013

Ben Meyers agrees with this theory of how blocs develop – he claimed that "a lot of these things are built with personal friendships. For a long time my house [Theta Chi] has had a very close friendship with Delta Tau Delta fraternity (known as "Delt") and with the Asian community. That is purely by virtue of my very close relationship with their former leaders."[23] In fact, according to Meyers, the current structure of the System has its foundations entirely in those kinds of relationships: he told me that in the mid-2000s, two friends from high school called Aron Weingard and Ryan Moseley each became presidents of their respective houses, Theta Chi and Sigma Phi Epsilon (or Sig Ep for short). Both also obtained influential leadership positions outside of their fraternities, and eventually Moseley decided he wanted to run for Student Body President in February 2007. According to a pre-existing arrangement within the System, the candidate that year was supposed to be a member of Alpha Epsilon Pi (AEPi) called Josh Weiss. After an internal fight within the System, Moseley ended up winning the presidency and he subsequently worked with Weingard to strengthen the positions of both of their fraternities by dividing the houses of their allies between themselves into two power blocs that were nominally distinct but closely allied. The result was that AEPi and its allies were completely isolated until 2011, when Meyers said that an error he made as Student Body President allowed that group to gain traction and to become a viable third bloc, having convinced several houses from the two larger blocs that an alliance with AEPi could be more fruitful for them in terms of their members gaining prestigious positions on campus.[24]

The result of that process is that the Greek community in 2013 is broadly divided into three blocs of roughly comparable size and influence: the first, known as the "social bloc", is the

[23] Author interview with Ben Meyers, Oct 2013
[24] Author interview with Ben Meyers, Oct 2013. The "error" in question will be discussed in more detail in the next section of this work.

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one developed by Moseley. It was led by Sig Ep until the national leadership of that fraternity decided to suspend its UF chapter in late 2012, allegedly as a result of various accusations related to drug dealing and alcohol abuse.[25] Since the disappearance of Sig Ep the leadership of the social bloc has reportedly transferred to Zeta Tau Alpha (or "Zeta"), a sorority that counts the current Student Body President, Christina Bonarrigo, among its members. The second bloc, known as the "political bloc", is still led in part by Theta Chi although the frontrunner for the Student Body President candidacy in 2014 is Cory Yeffet, a member of another house in the same bloc called Phi Delta Theta. The third bloc, known somewhat uncreatively as the "third bloc", continues to be led by AEPi. Clearly though, as suggested by the accounts above, the membership and power dynamics in each of the blocs is – to use Alex Cornillie's words in his recent interview with me – "a super-shifting landscape of organizations".[26]

Despite this fluidity within the System, the positions of some houses has remained relatively constant for a number of years. For example, multiple sources confirmed that Theta Chi has consistently been a major player in campus politics since at least the 1990s while Chris Spears, the current president of Pi Lambda Phi, told me that his fraternity has generally not been an active participant in political activities, at least not since it returned to campus in 2001 following a two-year absence.[27] Given the constantly changing landscape in terms of alliances and blocs, how can it be that certain houses are able to maintain a powerful position within the overall System for an extended period of time while others seem unable to get a foot in the door?

[25] The reasons for the suspension were never made public to my knowledge, but my interview with former Sig Ep brother Johnny Castillo supported the widespread rumors on campus that drugs and alcohol were among the main factors involved in the decision.
[26] Author interview with Alex Cornillie, Oct 2013
[27] Author interview with Chris Spears, Oct 2013

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One obvious explanation is that influence is directly proportional to membership size, as Alex Cornillie suggested in my interview with him:

> *"A large organization like a fraternity has over 100 members – that's a significant number of votes, and that is a substantial amount of power. It's not an unlimited amount of power, but it's a fraction of the entire electoral make-up, and much like any lobbying group like the NRA or PETA would get its members to vote a certain way to affect a United States election, so too the fraternities do the same kind of thing. So I didn't perceive that we had some kind of magical ability to control things beyond that."*[28]

While it is certainly true that some of the most influential Greek houses are also among the largest, it seems clear that numbers alone are not sufficient to secure influence. Cornillie was careful to qualify his remarks by saying that the size of any house is only important insofar as it translates into actual ballots cast for the System. According to several interviewees, this helps to explain why a fraternity such as Theta Chi holds more power than one of the minority communities such as the Black Student Union, despite the latter's far greater number of members. Nick Stinnett explained to me that because they do not have an effective means of mobilizing their members to vote, "BSU on a good day is worth a small sorority's worth of votes... they don't have as much turnout [as a Greek house]."[29] Regardless of the extent to which this perception is true when comparing an organization such as BSU to an individual Greek house, it is undoubtedly the case that the combined electoral power of all of the houses in a Greek voting bloc outweighs the power of any one "community" organization. Roger Austin, academic adviser and alumnus of Delta Upsilon fraternity, told me that this is almost certainly why the System tends to pick a white person as its presidential candidate: the mostly white Greek blocs are the most powerful in terms of sheer volume of likely voters, hence those blocs are able to always claim the number one spot on the System's executive ticket. If Austin is correct then it

[28] Author interview with Alex Cornillie, Oct 2013
[29] Author interview with Nick Stinnett, Oct 2013. In a later section I discuss how Greek houses organize their efforts to ensure that all of their members vote.

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seems that the System's apparent preference for white candidates is not a conscious result of institutional racism per se, but rather a reflection of the relative political influence of different power blocs on campus.[30]

However, even if the "size" of an organization or Greek house is defined as the number of voters it is able to successfully mobilize to vote in Student Government elections, it seems that size still does not fully explain the ability of a house like Theta Chi to maintain its level of influence within the System. Rather, several people told me that once an organization has achieved power in the System, it is able to leverage its advantage to produce more power for itself. According to Alex Cornillie, this is particularly true for a fraternity or sorority that holds a prestigious position such as the Student Body Presidency:

> *"When you have that power, that person who is the president is able to make all these appointments, so they trade off these appointments for all these different things, and suddenly find themselves with dozens of organizations beholden to them…. They can then parlay that power in the next election to maybe get someone else elected like, maybe they work to get their person elected as treasurer or vice president or something, and they build this kind of ball of IOUs and then they cash it in again and their organization gets to throw another president in, because they always have the political power. That's just what happens. You have the power, and you're able to constantly use it to generate more power. It's a self-perpetuating thing."*[31]

Aside from the conscious use of political capital, it also seems that the collective experience and knowledge of a fraternity or sorority can help to consolidate its position within the hierarchy. Matt Michel speculated that "after a certain point you just sort of build up some institutional momentum. You have a lot of people involved and who know how to get involved... once you have three or four of those, I think you just have enough accumulated knowledge over

[30] Of course, the fact that membership of those blocs is still divided in part along racial lines arguably indicates that broader racial divisions still exist on the UF campus and beyond. For example, my intervie$ws produced some evidence that racism still plays a role in the culture of some parts of the Greek community, as I explain in my second paper. However, I found little evidence to suggest that such divisions were unique to Student Government.
[31] Author interview with Alex Cornillie, Oct 2013

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the years [to succeed in the System]."[32] Sometimes this knowledge is even documented so that future members of a house can take advantage of their predecessors' knowledge – Ben Meyers told me that Theta Chi used to have a 300-page book in which brothers recorded their advice on how best to maintain the fraternity's influence within the System. The idea was that each new generation could add to the book so that their successors could learn from the achievements and failures of those who came before them. Although the book was discontinued for some reason before Meyers was active in Student Government, he cited this as an example of how "we were very big into our prior knowledge."[33] Nick Stinnett added that training its members to be leaders in the System was an important part of the culture at Theta Chi, and that this was another reason for the house's sustained success: "we work harder, we're very political, and we do a good job. A lot of people who the other houses put up for positions are grossly incompetent... we vet our own people before we put them up. If we don't think they can do the job then we don't put them there."[34]

The information presented above suggests a system in which influence for a particular house or organization arises from some combination of its size, its ability to mobilize its members to vote in Student Government elections, the skill that its leaders show in sustaining its existing power and generating more, the degree to which its norms encourage the retention of institutional memory, and the extent to which it trains its members for leadership positions on campus. Over time it seems that a house can gain a reputation for being influential, and this in itself can help to sustain that influence because it attracts a higher caliber of new, ambitious students than other houses do. Both Meyers and Stinnett told me that they joined Theta Chi

[32] Author interview with Matt Michel, Oct 2013
[33] Author interview with Ben Meyers, Oct 2013
[34] Author interview with Nick Stinnett, Oct 2013

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specifically because of the doors that they thought it would open for them in terms of political involvement on campus. It is a factor that Austin also emphasized as being important to sustaining the hierarchy, observing that "some guys come to college knowing which fraternities have the best parties and get laid the most, and go to those. Some of them know which frats have the best sports teams, and come here to play intramurals. And some kids join fraternities because they know they are powerful politically."[35]

[35] Author interview with Roger Austin, Oct 2013

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4. "The Room"

Regardless of how they achieve and maintain their status at the head of their respective blocs, it seems to be generally accepted that a few houses are perpetually the ones whose leaders will be involved in decision-making at the top of the system. I asked several former System insiders about the process by which key decisions such as candidates for major Student Government positions are decided. According to Meyers, each of the three blocs will send either one or two representatives to meet with the other leaders: the social bloc sends the leaders of Sigma Alpha Epsilon fraternity (SAE) and Zeta Tau Alpha sorority (who have replaced Sig Ep since the latter's suspension from campus); the political bloc sends leaders from Theta Chi and Alpha Epsilon Phi (AEPhi); the third bloc sends the leader of AEPi and, sometimes, a leader from a second fraternity such as Delta Upsilon or Kappa Sigma.[36] Bloc leaders are generally chosen at the sole discretion of their predecessors, rather than elected democratically by members of their houses.[37] This struck me as being particularly fascinating: I asked both Meyers and Stinnett whether the existence of such a nepotistic process ever seemed to alienate ambitious house members who knew they were not in line to be anointed as the next leader, even if they felt that they merited the role. Neither seemed to think the process presented a particular problem: Stinnett pointed out that even though the future bloc leaders might be known as much as a couple of years ahead of time, there are a wealth of other positions available to members of influential houses: "There's a lot to go around," he said.[38]

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[36] I found it interesting that, at least until Sig Ep was replaced by Zeta Tau Alpha sorority, all six of the houses with bloc leaders were fraternities rather than sororities. Whether or not this is indicative of a system that is still male-dominated is debatable – it is certainly true, for example, that there have only been six female Student Body Presidents in UF history, although two of those have been in the past four years. My own experience of Student Government is that there are currently female students in many of the most important positions, so my hunch is that the male dominance of the bloc leadership is more an anachronism than a reflection of current values within the System. It would, however, be interesting to look further into this.

[37] Meyers said that in the third bloc, AEPi members "might technically vote" but he seemed to imply that the vote was a formality and that bloc leaders in AEPi still essentially chose their own successors.

[38] Author interview with Nick Stinnett, Oct 2013

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semester a member of his house who had had nothing to do with the Student Government elections decided to run for a major leadership position in one of the largest student organizations on campus. According to Spears, the System party mobilized everyone it could who was a member of the organization in question to vote against the Pi Lam brother whose name was on the ballot, purely as a retaliation for the house's non-compliance in the Student Government election. Fortunately for Spears and his fraternity, their brother won the vote anyway, but Spears saw this as a clear example of the System's propensity to hold grudges against those who dare to defy it.

Indeed, my interviews for this work and my own involvement with the independent movement have uncovered numerous cases of the System finding ways to threaten organizations, even those such as Pi Lam who have no real stake in the patronage system that governs the appointment of positions in Student Government and Blue Key. Often these threats relate to Student Government's control over the funding of student organizations – an individual will be coerced into behaving in a particular way because they are told that their failure to comply will result in the defunding of any student organizations to which they are affiliated. I am aware of at least three reports of such incidents in the past two years alone, all of which have been verified by a sufficient number of sources that I am very confident of their veracity. The first two both involve members of UF's Mock Trial Team, which receives a large portion of its funding from Student Government.[106] In late January 2012, when Alex Cornillie and Jesse Schmitt had been chosen as the independent party executive ticket, they still did not have a candidate to run for Student Body Treasurer. Cornillie approached John Kelly, a roommate of his who was a good

[106] CLAS Student Council. "Frequently asked questions". http://web.csd.ufl.edu/classc/faq.html, accessed Oct 22nd 2013. The Mock Trial team receives Student Government funding as part of the College of Liberal Arts and Sciences Student Council. In 2013-14, that council received $28,000 from Student Government, although I was unable to find documents that showed how much of this went to the Mock Trial team.

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not have to vote.[121] In Roger Austin's view, this is the wrong battle for the indies to be fighting and is no different to the way in which Republicans and Democrats repeatedly contact registered voters in "real-world" elections on election days to encourage them to vote. "[If you're] complaining about voter boards, you're proving why you keep losing," Austin said. "You're politically inferior to your opponents, who are more sophisticated and know how to get out the vote."[122]

Most of the people to whom I spoke about the System's voter mobilization efforts said that a combination of regular harassment and "guilt trips" about the need to be supportive of house members who were running for office is often enough to get many Greeks to vote – indeed, as I will argue in my second paper, the norms and values of some fraternities and sororities seem to make them particularly good targets for mobilization strategies that appeal to voters' sense of loyalty and to their obedience towards the wishes of their house leaders. However, there is some evidence to suggest that the tactics used by house reps can sometimes move beyond simple encouragement of their peers. After the first day of the February 2010 elections, an anonymous source made a recording of a meeting for house reps that the System party reportedly held in a fraternity house. The recording, which was subsequently given to the independent movement and passed on to the press, allegedly features several party officials (including future Student Body Presidents TJ Villamil and Christina Bonarrigo)[123] expressing their displeasure at the low turnout that several of the houses had managed by this point in the election. At one point in the tape, a male voice praises two sororities' reps for some particularly

[121] University of Florida Student Government. "Previous Cases and Rulings". http://www.sg.ufl.edu/GovernmentBranches/Judicial/PreviousCasesandRulings, accessed Oct 3rd 2013.
[122] Author interview with Roger Austin, Oct 2013
[123] Two of the voices on the tape have been identified by multiple sources as being TJ Villamil and Christina Bonarrigo, the couple who would later be elected as Student Body Presidents in 2012 and 2013 respectively. Johnny Castillo, who says he was at the meeting where the recording was made, verified in my interview with him that the voices on the tape are indeed those of Villamil and Bonarrigo.

interested in rising up the ladder in Student Government – for them, showing that they can get all of their houses to vote is a way of proving themselves capable of bigger things. Castillo said that as a house rep, "you facilitate it any way possible so that they [your fellow house members] can vote, whether it's taking them to the gym so they can vote at the gym, or whatever. You have to make sure that the med student - who doesn't give a shit and hasn't slept in three days - goes to vote."[118] Most of the house reps display a "sticker board" in their house, which is a list of the house roster with a space next to each name where the corresponding member can affix the 'I Voted' sticker that they receive from the polls, to prove that they have voted. Throughout the two days of elections, System party leaders are in regular contact with the house reps to see what proportion of each fraternity and sorority has voted. According to Alex Cornillie, people who did not yet have a sticker by their name on the board would be would be "bothered over and over: 'Did you vote? Did you vote? Why didn't you vote? Why don't you go vote? How about somebody drives you there?' If they don't want to vote, just leave them alone! But that just couldn't be, so all of these votes were being cast by people who didn't really want to be voting, and I just felt that it distorted the whole electoral system."[119]

The existence of sticker-boards is an issue that has animated many within the independent movement for years – a referendum question asking whether to ban "I Voted" stickers from being distributed at Student Government elections was soundly defeated in September 2009[120], while in 2011 an independent party was banned from running for office in the fall election after one of its alumni was found guilty of distributing "I Voted" stickers to Greek students so that they would

[118] Author interview with Johnny Castillo, Oct 2013
[119] Author interview with Alex Cornillie, Oct 2013
[120] University of Florida Student Government. "Election Results". http://www.sg.ufl.edu/GetInvolved/Elections/ElectionResults, accessed Oct 3rd 2013.

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> *"They [the Alligator staff] have thrown away all journalistic integrity for the sake of those few dollars – misrepresenting facts, inaccurate quotes and completely falsified stories are just some of the ways that the Alligator has attempted to skew my message to the voters. They are no longer a paper motivated by student interest, but by financial greed, vengeance, and possibly something more. To address the rumors of racial discrimination by the Alligator, it is important to understand that this historic minority ticket is sure to face opposition. However, those who stand up for what is right will always prevail."*[133]

As noted earlier, Villamil was narrowly elected the day after this diatribe against the *Alligator*. However, that was not the end of the story: shortly after the election, Tiemeier admitted in a letter to the newspaper that he was guilty of throwing away the newspapers.[134] Despite this admission, Villamil has never (at least to my knowledge) publicly retracted or apologized for the serious charges that he made against the *Alligator*.

Aside from throwing away newspapers, another common trick employed by the System party is to change its name every few elections, particularly when the existing party brand has been damaged by negative headlines. Of course, this is not something that is unique to student politics, but in the case of UF it is notable for the vehemence with which System members publicly deny any link to the previous incarnation of the party. After the newspaper controversy and near-defeat of the spring 2012 elections, the System party rebranded itself from the "Unite Party" to the "Swamp Party" in time for the Senate elections of the following fall. Following the change, members of the "new" party including its spokesperson Daniel Landesberg claimed that "this is not a name change for the Unite Party… but a new party that stands for 'fair and proper representation of constituents and commitment for straightforward, no-nonsense government.'".[135] In fact, the leadership of this new party was filled predominantly with people

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[133] YouTube. "What the Alligator Won't Tell You". http://www.youtube.com/watch?v=DpbFDr7lvY8, accessed Oct 19th 2013.
[134] Tiemeier 2012
[135] Shavell 2012

who had played key roles in previous Unite Party campaigns. There is a long history of the System party changing its name: in his deposition for the 1998 Grapski defamation trial, former Student Body President Howard Christopher Thompkins admitted that "the party names are routinely changed and recycled from year to year"[136] – indeed, the name "Swamp Party" was previously used as recently as 2006 before it reappeared in 2012.[137] Another example of such a tactic came before the 2004 election, when Jamal Sowell split from the System and ran successfully against it for the presidency. For that campaign the System changed from "Ignite" to "Innovate", causing Sowell to tell the *Alligator* that the switch was not a new party at all, but simply a name change.[138]

A range of other questionable campaign strategies have been reported through the years: Gov. Graham said in a 2012 *Alligator* article that during his student days there were incidents of the System party "tapping phones to listen in on conversations of opposing parties"[139]; Debbie Wasserman-Schultz recalled that during the 1980s "Blue Key violated election codes and used petty intimidation tactics against her and her colleagues: torn-down party fliers, smear campaigns, slashed tires, [and] pouring sugar in an opponent's gas tank"[140]; Gov. Chiles remembered that when he was at UF, "parties would deface their own campaign signs or run sound trucks through campus housing areas blaring the name of the opposing candidate to give the other political party a bad name".[141] Indeed, the tactic of blaming the opposition for offences that were in fact carried out by System supporters is still used: on the first day of the spring 2012

[136] Pillow 2010b
[137] University of Florida Student Government. "Election Results". http://www.sg.ufl.edu/GetInvolved/Elections/ElectionResults, accessed Oct 3rd 2013.
[138] Aubuchon 2005, p. 38
[139] Flechas 2012
[140] Bushouse 1998
[141] Douthat 1991

election I received a phone call from an *Alligator* reporter asking for my reaction to a quote she attributed to Christina Bonarrigo (then the spokeswoman for the System party) claiming that the disappearance of copies of the *Alligator* was probably the fault of the independent party, who might be trying to frame her party in hopes of having them disqualified from the election. I responded by asking the reporter how plausible it seemed that my party would want to throw away copies of a newspaper whose front page featured the Florida Gators football coach endorsing our candidate. The discussion ended shortly thereafter.

Bonarrigo's apparent claim that the independent party was trying to abuse the process by which parties can be expelled for violating election codes is particularly galling in light of evidence I found during my interviews for this project which suggests that the System party itself made an attempt to exploit the complaints process for purposes that it knew to be illegitimate. During the first day of the election – an eventful day by all accounts – the System party filed a complaint claiming that an e-mail sent by candidates from the Students Party (the independent party) in the College of Engineering broke the rules governing campaigning over the internet. It seemed to be quite obviously a bogus claim, but the Elections Commission moved to disqualify the Students Party's engineering candidates. The Students Party appealed, and the case was to be settled by the Supreme Court after the election. Meanwhile the Students Party candidates won all three of the seats allocated to the college. Wilson told me that soon after the election, the Students Party's legal counsel Jon Ossip received a call from a leading member of Florida Blue Key who had helped to manage TJ Villamil's campaign:

> *"Jon got a call from [the FBK member], who said that they filed the complaint as an insurance in case TJ lost, and when TJ won they wanted to withdraw the complaint because - imagine this - it would look really, really bad if you disqualified an entire slate of people because someone sent out an e-mail... If TJ had lost by a couple of hundred votes then they planned to claim that the*

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> *'unfair e-mail' was the reason he lost, and they would try to get the Students Party disqualified. But TJ won, and now they didn't know what to do because they could not withdraw the complaint at that point. We won that Supreme Court hearing."*[142]

It therefore seems that the System party has a long and disturbing history of election tactics that are ethically troubling and, in some cases, illegal. However, there are two important qualifications I think it is important to make before closing this account of those tactics. The first is that my focus on the System party here should not be taken as an assertion that the independent movement has always been beyond reproach in terms of its methods. For example, one valid response to my claims about the System's frequent changes of party name is that the opposition parties have been guilty of similarly frequent changes. This is undeniably true, but I think the two cases are different in some important respects: my understanding of the history of the independent movement at UF (or, at the very least, its recent history with which I am most familiar) is that most of its "name changes" have been the result of genuine divisions within the movement. For example, the Students Party was created in 2011 as an attempt to reunify opposition to the System following a damaging split in which two separate independent parties had briefly existed. While it is probably true that the names of opposition parties have changed as often as has the System party, this has often been because of legitimate internal divisions rather than a cynical rebranding exercise designed to deceive voters.

That being said, there are certainly cases when opponents of the System have been guilty of ethically questionable behavior. One recent example happened during the February 2013 campaign, when an anonymously-authored website appeared online about presidential candidate Christina Bonarrigo. The site, called "The Truth About Bon Bon", claimed to be written by

[142] Author interview with Carly Wilson, Oct 2013. At Wilson's request I have kept the identity of the FBK member anonymous.

Exhibit 2C: Excerpts from Arcenas Honors History Thesis, Constructing The System: The Development of Political Machinery at the University of Florida (1921-1943) of brief introduction of the modern System and voter sticker collection mechanism via 2017 'No sticker = no parm' scandal and 2023 'sticker board' scandal

https://ufdc.ufl.edu/AA00114326/00001/pdf

Introduction

In 2017, the chicken parm scandal at the University of Florida erupted. A leaked screenshot exposed a Kappa Alpha Theta sister informing members that if they did not vote in UF Student Government elections and turn in their "I voted" sticker, they would not receive their chicken parmesan dinner: "NO STICKER = NO PARM."[1] This incident of UF Greek life voter coercion, however, was not isolated; in 2010, leaked audio tapes exposed the Delta Phi Epsilon sorority for refusing to let pledges eat until they voted in SG elections.[2] In 2023, an image surfaced of the infamous "sticker boards" collected by UF Greek houses, with members placing their "I voted" sticker to show that they had voted.[3] The organized voter coercion of Greek life—block voting—is the foundation of UF Student Government political machinery.

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[1] Mackenzie Behm, "Sorority Withholding Food from Members until They Vote in Student Government Election," *The Tab*, 2017, https://archive.thetab.com/us/florida/2017/09/27/sorority-withholding-food-members-vote-2017-sg-election-6523.

[2] Elizabeth Behrman, "Unite Audio Reveals Campaign Tactics," *The Independent Florida Alligator*, March 4, 2010, https://www.alligator.org/article/2010/03/unite-audio-reveals-campaign-tactics.

[3] The leaked image of the sticker board is shown above. Rey Audrel Zeth Arcenas, "Special Report: Sticker Boards, Leaked Messages Expose Vision Party Sticker Collection," *UF Politics Seriousposting*, October 4, 2023, https://medium.com/@uf_politics/special-report-sticker-boards-leaked-messages-expose-vision-party-sticker-collection-0a96571b8225.

The System, as UF's political machine has come to be called, currently consists of every campus Greek house and large non-Greek multicultural organizations.[4] The leadership honorary society Florida Blue Key (FBK) serves as the nucleus of this machine.[5] This three-fold alliance regularly dominates UF Student Government through the block vote, clashing with its opposition—known as the independent movement or indies—every election cycle.[6] The stakes of this electoral battle are millions of student tuition dollars, collected from an activity and service fee.[7] The Activity and Service Fee Budget, administered by UF Student Government, has grown to over $23 million in its most recent report.[8] Patronage politics is a staple of the System; FBK, the center of this machine, regularly leverages its control over student government to reward itself with hundreds of thousands of tuition dollars every year in the form of Gator Growl subsidies.[9] Within the System, certain Greek houses also "own" student government agencies, a practice known as "legacy positions."[10] Trained in the machine politics of UF Student Government and members of the "oldest and most prestigious honorary society in Florida," prominent Florida politicians have shaped (and continue to shape) the political landscape of the

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[4] A detailed study of the structure of the modern System is David Bradshaw, "Power, Patronage and Paternalism in the Gator Nation: Student Government at the University of Florida" (Master's Thesis, University of Florida, 2013). "The System" is a relatively modern name for the political machine that controls UF Student Government, first used in an academic work by Bradshaw.

[5] Mike Vogel, "Leadership: The New Blue Key," *Florida Trend*, February 1, 2004, https://www.floridatrend.com/article/12133/leadership-the-new-blue-key/.

[6] Bradshaw, "Power, Patronage and Paternalism in the Gator Nation: Student Government at the University of Florida," 9.

[7] For the 2019-2020 fiscal year, the A&S fee levied on students was $19.06 per credit hour. "SG Finance," University, *University of Florida Student Government* (blog), n.d., https://sg.ufl.edu/about/sg-finance/.

[8] The budget was $23,251,863.00 for fiscal year 2023-2024. Catherine Giordano, "Funding for Fiscal Year 2023-2024 Activity and Service Fee Budget" (UF Student Government, 2024), https://sg.ufl.edu/wp-content/uploads/2024/01/FY-23-24-Activity-Service-Fee-Budget.pdf.

[9] Rey Audrel Zeth Arcenas, "Florida Blue Key Has Taken Two and a Half Million Dollars of UF Tuition Money Since 2003," *UF Politics Seriousposting*, June 20, 2024, https://medium.com/@uf_politics/florida-blue-key-has-taken-two-and-a-half-million-dollars-of-uf-tuition-money-since-2003-92fbcf41abac.

[10] The most famous of these legacy positions are the ownership of UF's speakers bureau, ACCENT Speakers, by the fraternity Alpha Epsilon Pi and the ownership of UF's entertainment bureau, Student Government Productions, by the fraternity Theta Chi. Thomas Stewart, "ACCENT, SGP Ruled by Two UF Frats," *Gainesville Sun*, May 11, 2010, https://www.gainesville.com/story/news/2010/05/11/accent-sgp-ruled-by-two-uf-frats/31756824007/.

machinery at one moment in time. A historical outlook, however, traces emergence, development, and change—a necessary perspective for the over century-long existence of UF political machinery. This paper contributes to the literature by dispelling institutional mythologies. Machine politics did not hijack the otherwise neutral vessel of UF Student Government; machine politics created it. Florida Blue Key, too, did not degenerate into the nucleus of political machinery but grew out of that machinery. Beneath the superficial appearance of neutrality exists a long history of corruption, block voting, and dirty politics that created these institutions. The System exists not as an aberration but by design.

This thesis traces the history of UF political machinery prior to the Second World War. The first chapter details the origins of machine politics, centered around a post-World War I secret society of veteran students named "The Beefsteak Club." Beefsteakers created the 1920 and 1925 student government constitutions and monopolized student offices for half a decade, engaging in electoral fraud, financial abuse, and coercive voting. The Beefsteak saga dispels the notion of an uncorrupt beginning to student politics, as machinery constructed student government's edifice. The second chapter traces the emergence of the Blue Key Society, using primary sources to dispel its official founding story and uncover its outgrowth from Beefsteak machine politics. It then examines Blue Key's struggle against its early rivals, Omicron Delta Kappa and Blue Key National, as it remade itself into a society unique to the University of Florida: Florida Blue Key. Finally, the third chapter describes the political dynamics of the developing fraternity bloc system after the end of one-party Beefsteak rule. As the bloc system developed in the decade prior to the Second World War, students nevertheless questioned and challenged its legitimacy.

- **SET 3: Unite Tapes establish the 'I Voted' Sticker Collection mechanism utilized by Florida Blue Key to achieve enough votes for continued political dominance in the University of Florida Student Government (Exhibit 3A-3C)**

Audio recordings from the 2010 **"Unite Tapes"** reveal **voter coercion tactics** used by the FBK-backed Unite Party to maintain power. Members of the Unite Party were recorded discussing **withholding food from pledges** and **offering alcohol incentives** to ensure high voter turnout among fraternities and sororities. Additionally, the tapes detail the enforcement of **"sticker boards"** along with the use of different colored stickers from the first day and second day of voting used to track whether every member of a Greek organization had voted and when they had voted. Crucially, several parts of the tape implicate the **Supervisor of Elections** and **Elections Commission** as parties in close contact with Unite Party leadership on Greek voter turnout throughout the election cycle.

Exhibit 3A: Audio recording during Spring 2010 election known as the 'Unite Tapes' of the FBK-backed Unite Party (2009-2012) rally that featured alleged voter coercion tactics such as withdrawal of food, alcohol incentives, fearmongering, and sticker board enforcement

Audio uploaded to YouTube by UF Politics: https://www.youtube.com/watch?v=gsf7E8HQo9U,

Exhibit 3B: Full Transcript of the Unite Tapes via audio recording as transcribed by members of the Student Alliance Party that implicates Kappa Alpha Theta sorority for giving members alcohol for voting and Delta Phi Epsilon sorority for refusing to let pledges eat until they voted

Provided transcript of the Unite Tapes to Knight News by Students Alliance Party: https://knightnews.com/2010/03/scandal-rocks-student-government-at-uf/2/

PART 1 – The Pep Talk

[James Tyger]:

All right! Listen up! All right everyone, we are getting this meeting started. Apologies for being late, we're at a meeting with fantastic news. Our numbers are down, and that is what the elections commission has to say to us. Which means, means we are not where we need to be, okay. We are absolutely not on par with where we're gonna need to be in order to make this happen. Now I know there's some of you who are out there all day today, busting your asses sun up to sundown, but that is not enough. I need every single person in this room out there making

this happen for us, okay. I'm up. I'm barely sleeping. A whole bunch of us: Ashton, Marcus, Virlany. Up, not sleeping. Busting our ass to make this happen.

Now I don't know if you've seen these fliers. They've been plastered all around campus and all around apartment complexes, and you know what they are? This is what Ben Cavataro is up to while you're sleeping last night, okay. He and his party are walking around apartment complex to apartment complex at one, two, three in the morning and beyond to get this out there. They have candidates, they have volunteers, they have people on the ground willing to put the time in, to put them fliers in apartment complexes at four in the morning. Now I cannot stand here, and I did not take this position, to get schooled by Ben Cavataro and the Student Alliance party when we are so much better than them. All right. I, I can't even begin to explain how frustrated I am about leaving that meeting and hearing what our actual turnout was, what our actual results are for today.

I will not feel this way tomorrow. So I need every single person in this room to understand that this is not acceptable. So what we're doing tomorrow, this is not going to work. So with that, Googs.

[Andrew Guglielmo]:

I don't know if any of you know me, um, I'm actually on the ticket with some of you all. I'm Andrew Guglielmo. And more importantly, uh, I'm pretty fucking pissed off. So, ladies excuse my language but it's gonna be filled with this. This kind of shit, and the ratio of twos that I've seen this entire election. Every day that I've been walking around, if you guys haven't seen me, but I've been walking from corner to corner to corner to corner of this campus and seeing each and every person wearing a Unite Party shirt outnumbered by two.

Two people in green shirts have been compared to the one in the Unite Party. Now what the hell does that say about us? Does it say that we don't care? Does it? Do we care guys? Do we, do we care? Cause all I see is people with little giggles sometimes and they look away. A little giggle to their friends, and then look away at someone else. Go engage people, that's why you're here. You wanna be a student leader? Be one! I'm tired of people thinking that this is an excuse. It's not!

The excuse is you all. You all are not trying hard enough.

Hear it again. You're not trying hard enough. I expect each and every one of you to be outside, to be handing somebody a flier, to be engaging somebody, saying, "Hey, have you heard about the Unite Party?" and to get away from your little clusters, from your little friendships that you have with each and every single little person that your standing next to some gate, somewhere in the middle of campus. Get out there in the middle of it!

That's why they're more visible. That's why people know their names and not yours. Now I understand that some of you are candidates, and some of you are volunteers, and some of you are house reps. Trust me, I ran the campaign last year, I understand.

But that doesn't mean a damn thing.

All of you know the platform. All of you probably have a Unite Party shirt. All of you have no excuse but to be outside getting at least 10 votes per person, and those people should get 10 votes for them. It's exponential. It's easy. Do it.

We're going to break up, right here, real quick. Now that you guys may have your tails between your legs and you see my face is probably a little red. When you guys get into your groups, candidates, I expect you to be talking to Thomas [Hilton] and Naadira [Renfroe] about each and every second of your day tomorrow. You have less than 24 hours until nothing else matters, but the count. This is your election. This means just as much to you as it does to Ashton, Marcus and Virlany. Am I wrong about that? And volunteers and house reps, are you going to be the ones to let them down? Are you going to be the ones to just say, "Eh, there's, there's two minutes longer", "Don't worry, I'm gonna do my philanthropy right now", or uh, "Um, I'm just gonna, you know, go hang out with my friends at Yoga Berry?" That's for tomorrow, that's for the next day. Tomorrow is for the party. I expect all of you to be giving your blood, your sweat, and your tears for it, tomorrow especially.

We have houses and organizations that are less than 30 percent of where they should be! Last year we were at 60 percent. What does that say about right now? I hope your scared, cause I sure as hell am. So whoever is going to be organizing where you are going is going, they're going to be saying where you're going next. But house reps, you better get on the phone. Get on the phone to the older brothers, to the older sisters, to the older people in your organization. If your having such a problem getting their, their people out to the polls? Get your big brother or big sister to call them up for you. That's why you have these people. There's no excuse for us not to

win by 60 percent. We did it last year, we're going to do it again. It all matters how much you people in this room care right now. That's all I have to say to you. Listen up to where you're supposed to go.

[Jordan Johnson]:

All right, house reps go in the back corner back there. Candidates are staying in this room and volunteers are in this corner of the house.

[Chairs moving]

In a phone call Wednesday, Guglielmo said that he was not present for any of the discussions transcribed below. An earlier version of the transcript had attributed quotes to him quotes now attributed to "Unidentified Male 3." The Fine Print is continuing to verify the identities of all the unnamed speakers.

PART 2 – The Anti-Greek Conspiracy

[Unidentified female 1]:

All right, guys so [inaudible] not ok. You guys, please be quiet. Be respectful. First of all, if we call you guys at 8:30 in the morning, please pick up. If we call you any time during the day, please pick up, like we're doing that so we can communicate [inaudible] and obnoxious when I have to call presidents because representatives aren't talking to me.

[Unidentified male]:

Hey can you all quiet down a little bit back there please.

[Unidentified female 1]:

Please be respectful. I know this is not our jobs. I did it last fall. It's stupid, it's annoying. I know it's retarded, like, you have to call your sisters, call your brothers, all the times like will you come out, do this, go vote, like listen guys, literally right now, numbers at the polls, we are going to lose by a landslide. I told you guys this is where we have 4,000 votes as a Greek community. Over 4,000 votes.

If we cannot win this election, then we have [inaudible] these **Student Alliance, this is ridiculous, these people don't have friends. Like you think I'm kidding, these guys don't have friends. It's not funny, like these kids are the kids that want to take down the Greek system. They don't want Sorority Row buses. They don't want Fraternity Row buses. They don't want block special [inaudible]. They don't want parking privileges that we have on Sorority Row where you get your house parking, or [inaudible]. They want everything gone for us. It's not a joke, they want to see every letter that we have stripped away from us. They don't want us to live the life that we have. I'm being serious, guys, like, you may not realize this now, you may not realize the impact of these elections, but this can alter every single way that we live.**

[Inaudible] elections this year.

The executive ticket, we need to go out and support, we need to support our Senate too, because **how we run this campus is through passing bills and getting certain things pushed through, and we're not going to be able to do that if half of their people are in there and half of us, 'cus then we do have to have them have these bills passed that we don't want that are going to hurt us.**

Please step it up guys, there's no excuse why tomorrow each and every one of you has to have 100 percent. Like, there's no excuse. [Inaudible] If you are below 50 percent, that's embarrassing. You should be saying to yourself, "It is not hard to get 50 people out and vote." It's really not. You go before dinner, you go before lunch, you go in between, you go real quick to class. If I can do it in five minutes and I have a meeting every single time, if I have classes literally scheduled every single day at every single hour, and all these other things, then every single one person that I know should be out there too.

Unacceptable guys. This is embarrassing to not have our Greek support right now. [Inaudible] Sigma Nu, um, Delta Upsilon, and, uh, Chi Phi, Lambda Chi, you guys have 100 percent. Like, that's amazing. You guys all did well. I applaud you. Everyone else should applaud them. That's amazing, get out every single one of their volunteers, their brothers and members out. The rest of you, you need to step it up, like honestly, we need to step it up. [Inaudible] There is no excuse. [Inaudible] if you guys want to win… [inaudible]

[Unidentified female 2]:

Um, also guys, with, like, polling locations, please keep using drivers tomorrow. Um, get some volunteers that drive people that haven't voted to the locations. Like, not going on campus or, like, the polling location that they have to go to is too far is not an excuse. Like, you guys should have at least one driver at every time tomorrow volunteering to be able to drive people back and forth to the polling locations. They are scattered around a lot and we just don't want to have that be a reason why people aren't doing well.

[Unidentified male 2]:

Also, like, it's also true, like, one of my brothers or somebody's sisters might have leaked like, "Steal the stickers because like the lady they were talking to wasn't looking." That's not the point of why we have you fill the board up. We have you fill the board so that we actually get the votes, so keep that in mind if somebody comes by and puts stickers on it, like, you know, just to fill it. That's not why we're doing this. We're doing this because we need the votes, so the houses that already did that, you know…

[Unidentified female 2]:

We know that you guys aren't doing it. Just be aware that you're going to have members of your chapters that obviously don't care as much as you guys and might be doing that, so really, really, really discourage that.

[Unidentified Male 3]:

All right guys, um, I want to start off thanking Delta Upsilon, and Lambda Chi, um, and the other two fraternities, Sigma Nu and, uh, Chi Phi. Uh, DU and Lambda Chi, you guys were done, you know, halfway through the day and you made my life a little bit easier. Uh, so that's the good. There was more good. Uh, Theta, you guys had that incentive of getting your girls a bottle, not too many sororities do that, that's awesome.**Uh, DPhiE, I know you had your baby pledge class that they couldn't eat until they went and voted. [Giggles] That's amazing, that's what you need to do. So I applaud you all for doing that.**

Um, now, now we get to the bad news, okay. I woke up, you know, 5:30 this morning, not a big deal, walked up and down the row, nothing too serious, didn't see anything out there. I went to Enclave, Canopy, Woodlands, uh, I went to Estates, and Gainesville Place, and those stupid kids fliered every single one of those cars, and of course I took them down. So one, they pissed me off already because I had to wake up at 5 in the morning and ruin my entire day. I look like a bum, I feel like a bum. I feel miserable and shitty, I'm getting sick. So first off, I hate these guys.

Now, if you guys, like, I mean, I feel like, you know, you don't really get it. They stole a ream of stickers today, so that's why I took all your boards, just, not because I don't trust you, just because you never know [inaudible] your brothers [inaudible] and I marked all, on all the slots you guys haven't voted, because, uh, **tomorrow, the [I Voted] stickers will be changing. They're gonna be a different color, I'm telling you that right now. So you try and fuck with us, and you try and change the stickers, or keep the seame ones and put them on there, we're going to know. 'Cus we're not retarded, you know, we have the numbers from today.**

Um, and, if this, if that shouldn't scare you enough, I kinda want to tell you a little bit about the Greek system. Uh, I looked at the numbers from last year and I was comparing them, we are 700 votes down from the first day of last fall. Seven hundred votes down. Um, if you guys were on the Google Doc, which you should have been all day, and you checked, you know, we had twenty four hundred people come and vote today. You think that's pretty good? Well, fifty eight hundred people voted. Where the fuck did we get those other people? I'm literally freaking out, because I've never seen anything like that. Like, if you don't think that that's a bad thing, then you should walk out, because this could be a catastrophe. We have the potential to lose it all, and we're not going to lose it on my watch. All right? I need you guys to step up your game, big time! Houses: I mean, I hate calling people out. DG: you guys have the largest sorority and you guys are at, what, how much percent?

[Unidentified female 3]:

Twenty-four.

[male voice]:

Twenty-four percent. Um, Phi Delt, where were you guys? You guys have the largest fraternity right now in active members, you guys have… [cut off]

PART 3 – Voting Board

[Unidentified]:

[cut off]…thirty brothers. I wanna tell you, DU doubled you guys and they have a third of your brothers. So to put it in perspective, that's awful. Um, [giggles] ATO[?], Chi O, uh, Delta Chi, Tri Delt, I mean, all you guys are in red right now, because you're so low and you're way down from last year. I can't explain it to you enough how bad that is. We have a couple sororities, I mean, the sororities are really carrying it right now. Um, you guys are leading the way. You have, you know, six houses with over 100 people, which is great. But then you guys have, you know, like, frat stars, [inaudible] fraternities. What are you guys doing? We need to get out there. We need to get our people to vote. I know it's annoying, I know it's hard getting your brothers to go vote, but we have pledges. Okay, they have cars. Stop everything what you're doing tomorrow, and get them to go vote first thing in the morning. I do not wanna be running around Sorority and Frat Row. I have a midterm tomorrow at six o'clock.

Like, this is the last thing we need to be dealing with during this campaign, and the fact that we're down over 3,000 votes is scary. We haven't seen anything like this in a while. You know, I hate to be hard on you guys, but this is what it comes down to. Um, tomorrow, it's gonna suck. They're going to pull shit out of their ass like they always do. They stole those stickers. You know they are going to be doing something crazy tomorrow. Um, I, I don't know what yet. I'm going to be up at five in the morning again, and it, you know, it sucks cause I got a social tonight. I know a bunch of you guys do.

And, and this is what it comes down to. I do not wanna lose our way of life. It's not gonna happen on my watch. So with that being said, fraternities especially, you guys need to get on the ball. I'm sorry, there's no other, like, no ifs, ands, or buts. You guys need to get on it. You're dropping the ball, big time. And you know, it's a shame, because, like, we should be killing right now. There's absolutely no reason, we have everything in line, people are campaigning their ass off, we're doing fine out there. The candidates are the most qualified kids. The Reitz Union thing is going great, and these people are cheating. They are straight up double voting. They're getting

their little freshmen and sophomores to go vote in different locations. And, yeah, we'll notice that like a week later.

But tomorrow, when the results come out, and we lose, we're going to be like, "Holy shit, we just lost our way of life." And everyone is going to freak out and everything before you is gonna fall apart. And that's the last feeling I want. I mean, I can't stress that to you guys enough. You guys should be going to be tonight freaking out. I, I ,I don't even know if I can sleep tonight, like, I'm shaking right now.

Just when I saw that text from Arianna, the Supervisor of Elections, and she said, you know, "Fifty-five hundred people went to go vote." And I saw my Greeks only came out with twenty-two hundred. 'Cus I know we can get out, you know, a thousand more people from the community. I know [inaudible], cause they don't come out that hard. I know, like, those numbers are coming out from somewhere completely random, and cheat, and fake.

And if we lose this goddamn election, uh, on my watch, you know, it sucks, it's on my back, I know that, but like, I cannot let the Greek system down. You guys cannot let the Greek system down.

This is what we live for, this is why we pledge. Um, everything about it. This is why we run this campus, and we have been for the last century.

And the fact that we are on the verge of losing it is freaking me out right now. So with that said, protect your boards. Be on the ball tomorrow. Um, if you guys need help, let us know. If you guys need rides, let me know. I can coordinate pledges. Um, Naviv[?] can coordinate pledges. We have people man, that's what we're known for is having people, and we're not using them right now.

Um, I don't care what older brother, if he's being a dick. I don't care what older sister is harassing you and yelling at you and being a complete bitch. Get on the leadership of your house. Get on the older people that you trust to help you out. You're not doing this alone, okay. That's the last thing that should be running through your mind. Like I said, this is a stepping stool for you guys. You guys want to get ahead, and we gotta kill this election tomorrow. We gotta win this election tomorrow. That way, we can continue dominating this campus, continue

doing what we want, and continue living the life that we live. I, I mean, I cant stress that to you enough. Um…

[Unidentified female 1]:

Here's a couple things. Some issues that I personally deal with when I come across these problems with older brothers or sisters saying things, "Oh, I can't vote, I have class all day," or, "It's a different location." I call every single person on that board and I go, "What time is your classes?" And if they are at lunch, I drive them personally to that location. As their house rep, you need to do that. I'm sorry, it sucks. You have to be doing this all day, but this is what we need to do. If we need to bring the older brother or sister there, that's what we're going to do. You're going to take them anytime tomorrow. You need to be up tomorrow at 7:30 cause the polls open at 8 and if someone needs a ride at 8, then you need to be up. I'm serious guys, we're calling at 7 to wake you guys up. Be up. Do not go out tonight. It will piss me off beyond belief. If I find out you guys are out and then tomorrow you happen to sleep in, it's not acceptable. That happened yesterday and that pissed me off. When [inaudible] weren't returned when I called ten million times. That's not cool, because this is how we lose elections. It's by dicking around and thinking that we have this election in the bag, because we don't.

This could be the first time that we lose completely an exec ticket and, uh, Senate slate. If you guys are chill with that and wanna go rage tonight and think it's all cool, go do it, see if you guys can go do that in a couple weeks when everything's destroyed.

Literally guys, please, like, go [inaudible]. If you have rides, I know my house. I'm going to start talking to girls in the IFPC[?], I'm gonna start saying, "I'm going to be there for rides." You have a computer, [inaudible], or you know other people who have computers. Come do shifts. Like, rotate shifts. Like, have someone drive them for a few hours. And bring those [inaudible].

All of you guys have the polling locations. Its online. It's at sg.ufl.edu/elections. It's simple. Show every single one where they are voting. You guys [inaudible], let them give you an excuse of why they did not vote. There is no excuse.

I don't care if they are 25 or 17, they are going to vote tomorrow. Whether they like it or not. Whether you have to drive them there [inaudible] while they are screaming and yelling at you.

You are going to have to take it for tomorrow, suck it up and get me [inaudible], ‘cus right now they are beating us 2 to 1.

So, like, guys, this is so scary, because I’m in Senate. I see what these people do. It’s horrible, literally horrible.

Also, if you’re below right now, we’re going to call out names. If you are down, we’re gonna personally sit down with you and talk to you about ways we are getting numbers up tomorrow. Other than that, if you have 100 percent, thank you so much, you guys are doing great, you guys should know…

[Unidentified Male]:

Um, but wait, those guys that did 100 percent, again, again, congrats. But you know, like I called you and said, the job’s not over. Uh, I know I’ve been talking to Sean.

Um, like houses, you know, get five more stickers, you know, from your little freshmen that live in the dorms and whatnot. And you know, talk to the GDI’s [God Damned Independents] in the dorms, and get them to go vote, and collect their stickers, put them on your boards. ‘Cus like I said, we want over 100 percent. Um, that was my goal, and you know, right now, I’m rushing to get 80, ‘cus I’m freaking out right now. But for the most part, um, so like I said, job’s not over yet. Make sure you guys keep getting people to go vote. Um, with that said everyone can leave except for:

[Unknown female]:

AGR, Chi O, Chi Phi, Delta Chi, Tri Delt, DG, KD, K Sig, Phi Delt, FIGI, Phi Tau, Sigma Chi, [inaudible].

[Unidentified Male]:

All right, if you weren’t one of those houses [inaudible] you guys can go, and I’ll talk to you all tomorrow in the morning.

[Chairs moving]

Exhibit 3C: Alligator article on the Unite Tapes that reveals the audio was sent to the Student Alliance Party via an anonymous house representative at the meeting, Unite Party members deny the voter coercion allegations while Student Alliance Party members denounce the recordings as 'casting a shadow' and 'delegitimizing Student Government as a whole.'

https://www.alligator.org/article/2010/03/unite-audio-reveals-campaign-tactics?ct=content_open&cv=cbox_latest

At Tuesday night's Senate meeting, Student Alliance party supporters played an audio recording of a Unite Party general meeting on the night of Feb. 23.

In the audio recording, the discussion among Unite Party members and supporters included a description of sororities and fraternities being rewarded and punished for voting in the spring 2010 Student Government elections.

The statements implicated Kappa Alpha Theta sorority for giving members alcohol for voting and Delta Phi Epsilon sorority for refusing to let pledges eat until they voted, according to the recording.

The Student Alliance party's transcript cited Andrew Guglielmo, a Unite Party candidate for a graduate Senate seat, as the speaker describing these practices.

Editor's Note: *The first segment of an audio recording is allegedly from a Feb. 23 Unite Party general meeting. The recording was forwarded to the Alligator from Student Alliance party Sen. Jonathan Ossip, who received it in an e-mail from a fraternity house representative for the Unite Party. The house representative wished to remain anonymous.*

Guglielmo denied making these statements but said he was present at the meeting and did address the group of Unite Party members and supporters.

He discussed the importance of campaigning and spreading the Unite Party's message.

"It was meant to be a kind of a rally and a last-day push," Guglielmo said.

Editor's Note: *This second segment of an audio recording is allegedly from a Feb. 23 Unite Party general meeting. This segment includes a speech by Unite Party member Andrew Guglielmo in which he criticizes members for not putting enough time into campaign efforts. He confirmed to the Alligator his statement at the meeting ended with, "Listen up to where you're supposed to go."*

In the recording, attendees at the meeting can be heard laughing after the statement about Delta Phi Epsilon.

Student Body President Jordan Johnson said he was not present when the statements were made but feels the laughter indicates that the statement was meant as a joke.

"The Unite Party does not determine individual incentives given out by organizations in return for voting," Johnson said.

Guglielmo said the Unite Party does not promote hazing, and he has never promoted it. He said voter coercion is not possible in the SG election system.

"There's no one in that booth with you telling you how to vote," Guglielmo said.

But Student Alliance Party Senate leader Jonathan Ossip said the idea that pledges are not allowed to eat until they vote represents voter coercion.

"It really threatens the integrity of the election as a whole and also really casts a shadow on the legitimacy of Student Government here at UF," Ossip said.

Ossip said the audio came from a fraternity house representative for the Unite Party.

Editor's Note: *The third segment of an audio recording is allegedly from a Feb. 23 Unite Party general meeting. Although the Student Alliance party's transcript of this portion of the audio identifies Andrew Guglielmo as making three more statements, Guglielmo denies speaking in this segment of audio. The identities of the speakers can not be confirmed.*

Ossip said the member recorded the meeting and e-mailed the recording to himself and Student Alliance party member Josh Niederreiter.

The source who e-mailed the recording asked to remain anonymous.

- **SET 4: Extensive allegations establish Florida Blue Key's monetary conflicts of interest via political influence and domination at the University of Florida Student Government (Exhibits 4A-4F)**

Extensive allegations suggest that FBK extracts millions of dollars in student tuition funds through **"legacy positions"** in well-funded agencies like ACCENT and Student Government Productions (SGP). Evidence points to a "grift" where former agency chairs, who are often FBK members, later work for private talent agencies that negotiate **lucrative contracts** with those same student agencies. Public records indicate that FBK has received over **$2.5 million** in student tuition subsidies for the Gator Growl event since 2003.

Exhibit 4A: Allegations of Florida Blue Key's conflict of interest within ACCENT Speakers Bureau via UF Politics article

https://medium.com/@uf_politics/bombshell-investigation-exposing-the-accent-speakers-grift-79fedf838aad

Past exposes on ACCENT Speakers focused on its status as an AEPi legacy position. Within the System, certain houses own certain student government positions, and such a deal is called a "legacy position." Prior reporting by the Alligator in 2005, Gainesville Sun in 2010, and the Tab in 2017 have routinely exposed the relationship between AEPi and ACCENT Speakers going back to the 1990s.

Accent Chairmen 1990-2005

Year	Name	Fraternity
1990 – 1991	**Richard Brilliant**	**Alpha Epsilon Pi**
1991 – 1992	M. Scott Thomas	Phi Delta Theta
1992 – 1993	**Marshall Rothman**	**Alpha Epsilon Pi**
1993 – 1994	**David Selfer**	**Alpha Epsilon Pi**
1994 – 1995	**Michael Cotzen**	**Alpha Epsilon Pi**
1995 – 1996	**Michael Namath**	**Alpha Epsilon Pi**
Fall 1996	David Meade	Tau Kappa Epsilon
Spring 1997	**Adam Sheinkopf**	**Alpha Epsilon Pi**
1997 – 1998	**Andrew Rosin**	**Alpha Epsilon Pi**
1998 – 1999	**Jason Collier**	**Alpha Epsilon Pi**
1999 – 2000	**Justin Sternberg**	**Alpha Epsilon Pi**
2000 – 2001	**Mike Mosseri**	**Alpha Epsilon Pi**
2001 – 2002	Rob Heekin	Sigma Chi
2002 – 2003	**Eric Trabin**	**Alpha Epsilon Pi**
2003 – 2004	**Seth Denison**	**Alpha Epsilon Pi**
2004 – 2005	**David Buchalter**	**Alpha Epsilon Pi**

For only 2 1/2 years in a 15-year span was UF's speaker bureau run by someone outside Alpha Epsilon Pi Fraternity. No women have chaired Accent since 1981.

2005 graphic from the Alligator exposing the AEPi legacy position of ACCENT Speakers.

Florida Blue Key plays an essential role in the ACCENT legacy position as many ACCENT chairs are later tapped into Florida Blue Key, a prestigious status which rewards those who comply with the corrupt bargains brokered among Greek houses (see Appendix B).

Following The Josh Richards Money Trail

The uf_politics team received an anonymous tip from someone claiming to be inside the System. The anonymous tipster stated, "the josh Richards thing was a way bigger [issue] than people will prob know about." When asked to elaborate, they hinted that the real issue with Josh Richards was the money trail. Intrigued by the anonymous tip, we started to investigate ACCENT's finances related to Josh Richards's guest appearance. Referring back to the contract ACCENT signed with Josh Richards, he was represented by a talent agency known as United Talent Agency Speakers.

Executed for Sponsor:

by William Reins

Title Assistant Vice President for Student Life

Date 6/6/2022 | 9:30 AM EDT

For Greater Talent Network, LLC dib/a UTA Speakers

by David Buchalter

David Buchalter, Senior Vice President

Date 6/6/2022

Signatures on the Josh Richards contract.

The UTA Speakers representative on Richards's contract is **David Buchalter**. Based on previous public records requests, he was a former chair of ACCENT Speakers Bureau from 2004–2005. He was tapped into Florida Blue Key in Fall 2004. He is also an AEPi. Based on his LinkedIn, David Buchalter joined UTA Speakers in August 2005. This means that, in the span of a few months, Buchalter went from working for ACCENT to negotiating with ACCENT on deals worth upwards of hundreds of thousands of dollars.

Experience

Agent
United Talent Agency
Aug 2005 - Present · 18 yrs
SoFLa, NYC

Representing the world's most popular, entertaining and informative speakers from all different walks of life.

Screenshot of David Buchalter's LinkedIn.

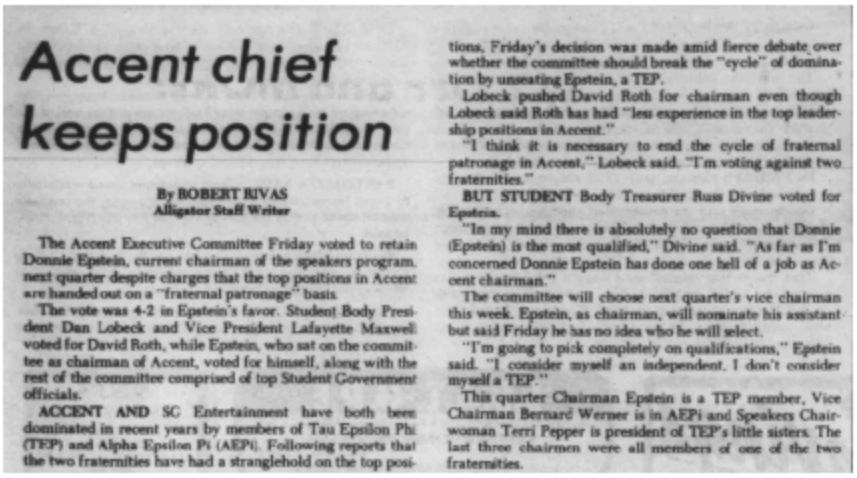
In the ACCENT contracts for Bill Nye's 2020 talk, Barbara Corcoran's 2022 talk, James Lafferty/Chad Michael Murray's 2023 talk, and Giancarlo Espocito's 2023 talk, David Buchalter consistently appears as the UTA Speakers representative.

With only a few hours of research, our team had stumbled upon an appalling conflict of interest: Buchalter was a former ACCENT chair, AEPi, and Florida Blue Key yet negotiates contracts with ACCENT Speakers (controlled by AEPi and Florida Blue Key). We decided to investigate UTA Speakers further.

Greater Talent Network: It's Florida Blue Key All The Way Down

In 2017, United Talent Agency acquired the Greater Talent Network (GTN). GTN was the agency ACCENT Speakers worked with prior to their acquisition and its name remains under UTA Speakers as seen in the excerpt from the Josh Richards contract.

GTN was founded in 1982 by Don Epstein. **Don Epstein was also a former chair of ACCENT Speakers in 1976–77, tapped into Florida Blue Key in fall 1977, and a TEP.** His tenure as ACCENT Speakers chair was mired in controversy over legacy positions. In 1977, ACCENT was dominated by the fraternities TEP and AEPi. Student Body President Dan Lobeck attempted to oppose Epstein for his TEP affiliation, but failed.



Accent chief keeps position

By ROBERT RIVAS
Alligator Staff Writer

The Accent Executive Committee Friday voted to retain Donnie Epstein, current chairman of the speakers program, next quarter despite charges that the top positions in Accent are handed out on a "fraternal patronage" basis.

The vote was 4-2 in Epstein's favor. Student Body President Dan Lobeck and Vice President Lafayette Maxwell voted for David Roth, while Epstein, who sat on the committee as chairman of Accent, voted for himself, along with the rest of the committee comprised of top Student Government officials.

ACCENT AND SC Entertainment have both been dominated in recent years by members of Tau Epsilon Phi (TEP) and Alpha Epsilon Pi (AEPi). Following reports that the two fraternities have had a stranglehold on the top positions, Friday's decision was made amid fierce debate over whether the committee should break the "cycle" of domination by unseating Epstein, a TEP.

Lobeck pushed David Roth for chairman even though Lobeck said Roth has had "less experience in the top leadership positions in Accent."

"I think it is necessary to end the cycle of fraternal patronage in Accent," Lobeck said. "I'm voting against two fraternities."

BUT STUDENT Body Treasurer Russ Divine voted for Epstein.

"In my mind there is absolutely no question that Donnie (Epstein) is the most qualified," Divine said. "As far as I'm concerned Donnie Epstein has done one hell of a job as Accent chairman."

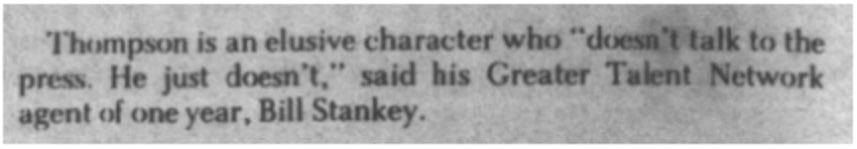
The committee will choose next quarter's vice chairman this week. Epstein, as chairman, will nominate his assistant but said Friday he has no idea who he will select.

"I'm going to pick completely on qualifications," Epstein said. "I consider myself an independent. I don't consider myself a TEP."

This quarter Chairman Epstein is a TEP member, Vice Chairman Bernard Werner is in AEPi and Speakers Chairwoman Terri Pepper is president of TEP's little sisters. The last three chairmen were all members of one of the two fraternities.

Alligator article in 1977 about Don Epstein's controversial appointment.

After leaving UF, Don Epstein worked as an agent at New Line Cinema before founding Greater Talent Network in 1982. The earliest evidence that ACCENT Speakers worked with GTN is found in an off-handed mention of the company by the *Alligator* in 1983.



Thompson is an elusive character who "doesn't talk to the press. He just doesn't," said his Greater Talent Network agent of one year, Bill Stankey.

First mention of Greater Talent Network in 1983.

Greater Talent Network, the company that ACCENT Speakers has been using for four decades, is founded by a Florida Blue Key, TEP, and former ACCENT chair. Its current representative for ACCENT contracts is also a Florida Blue Key, AEPi, and former ACCENT chair. Both transitioned relatively quickly from their positions at ACCENT to a position that benefitted from negotiating with ACCENT.

DON EPSTEIN
Founder and chief executive officer, Greater Talent Network
EDUCATION
Miami Beach Senior High School, class of 1974
University of Florida, class of 1978
WORK EXPERIENCE
1979-81
Agent, New Line Cinema
1981-82
Co-founder, Epstein-Winthrop International
1982-PRESENT
Founder and CEO, Greater Talent Network
1989
Signs author Michael Lewis as a client
1996
Adds Ambassador Richard Holbrooke and other politicians to client roster
2004
Branches out into broader management services
2012
Celebrates 30th anniversary with big party at the United Nations
LIFE LESSONS
"Counterculture guys—Abbie Hoffman, Timothy Leary, Jerry Rubin—came to Miami Beach to protest the Republican National Convention in 1972. I befriended them. Later a bunch of them became some of my first clients."
"I ran all the speeches and concerts on campus. The first speaker I got was Jane Fonda. I also got Hunter S. Thompson."
With former Nixon White House Counsel John Dean at the University of Florida in 1977
With Thompson in 1989
"They were financing a lot of operations by having the people in their films give speeches. Bob Shaye [founder of New Line] was a great person to learn from."
"I went to Bob and said, 'You taught me a hell of a lot. I will never forget this or take a client, but I can do this on my own.' "
"We were working in a basement on 74th Street in a brownstone. My first two clients were P.J. O'Rourke and Tom Wolfe."
With Wolfe in 1995
"We represented the Tuohy family from *The Blind Side*, Meredith Whitney from *The Big Short*, Billy Beane from *Moneyball*."
"Somewhere around 2005 it became more about Silicon Valley and business leaders. The CEOs became the celebrities."
"Toward the end of the '90s, politicians were all starting to write books. People really wanted to hear them give speeches."
With President George Bush at the White House in 2009
"It was the first time the UN allowed anyone to throw a party in the Rose Garden. I picked three people to do five-minute toasts: Wolfe, O'Rourke, and Ed Victor, the literary agent from London."
"When I first started, the top speakers were getting $10K or $15K. Now the numbers are $250K, $300K, $400K. The more somebody doesn't want to do it, the more the number goes up."
With then-Newark (N.J.) Mayor Cory Booker at CFN's 30th anniversary party in 2012
1. "Passion is the most important avenue to success." 2. "I have a plaque on my desk that says, 'The Buck Starts Here.' " 3. "Love what you do or get out."

Timeline of Don Epstein's career, from his time as ACCENT chair to running one of the largest speakers bureaus in the country.

Quantifying the Grift

According to articles about Greater Talent Network, GTN receives a cut of 20–30% of the fees paid to speakers depending on the client.

> Greater Talent is a private company and does not share financial metrics, but Epstein said the firm has been in the black since day one and has never laid off an employee because of business conditions.
>
> With 40 full-time workers, Greater Talent sells about 1,550 engagements a year for which its speakers command anywhere from $7,500 to $200,000. Between 20 and 30 percent of those fees go to Greater Talent, depending on the celebrity and the amount of marketing involved. The firm also earns about one-fifth of its revenue by organizing publicity campaigns and endorsement deals.
>
> Between 20%–30% of the speaker fees goes to GTN.

Based on contracts and news articles that explicitly mention GTN, our team has documented that ACCENT has spent at least $1,237,900 since 1983 on speakers through GTN (see appendix A). Assuming a low estimate of 20% for each speaker, **GTN received at least $247,580 from ACCENT Speakers since 1983.** Because our documentation is limited to instances where GTN was explicitly identified, and we have multiple-year gaps in our list, the real numbers are likely in the **millions of dollars.**

Exhibit 4B: 2023 Independent Alligator article on Florida Blue Key's alleged financial conflict of interest within ACCENT

https://www.alligator.org/article/2023/09/student-government-agency-accent-speakers-accused-of-misallocating-student-funds

NEWS | CAMPUS STUDENT GOVERNMENT

Student government agency ACCENT Speakers accused of conflict of interest, misallocating student funds

Obtained public records requests show connections to Florida Blue Key, Greater Talent Network

By Vivienne Serret
September 25, 2023 | 6:15am EDT

SG generic Photo by Kate McNamara | The Independent Florida Alligator

Update: Florida Blue Key President Brady Alexander reached out to The Alligator for an official statement Sept. 26.

ADVERTISEMENT

Obtained documents, a Reddit post and public record requests on the UF Student Government agency ACCENT Speakers allege the agency has financial conflicts of interests to the Florida Blue Key institution.

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By Leona Masangkay | Jan. 29

The Hamilton School's blind spots, from the perspective of one of its students
By Sasha Morel | Jan. 24

Florida Blue Key's Statement

"Florida Blue Key, Inc. is an independent student organization, separate from Accent, and not affiliated with Greater Talent Network (GTN), as referenced in the article," Alexander wrote. "While an alumnus of Florida Blue Key may have founded GTN, Florida Blue Key, Inc. does not have any investments and has never owned GTN."

The Allegations

Rey Arcenas, a 20-year-old UF history junior, runs UF Politics, an Instagram account that regularly posts about student government and UF administration. He filed a series of public record requests against ACCENT for the last several months, alleging the agency has been in a conflict of interest with a talent network that was founded by an FBK alumni.

Arcenas alleges he found out about the conflict after an anonymous source within The System told him there is a money trail within ACCENT Speakers — such as infamously paying TikTok star Josh Richards $60,000 for his talk in the Fall 2022.

The System, Arcenas wrote in a post, is "a century-old political machine consisting of Greek houses, Florida Blue Key, and the communities that historically and continues to dominate campus politics."

"Greater Talent Network was started in the 1980s by a guy named Don Epstein...he was a Florida Blue Key [and] a former ACCENT chair," Arcenas said. "This whole company is just Florida Blue Key."

Arcenas said the records show the free ACCENT shows have student tuition funds allocated to Greater Talent Network, which is owned by an FBK alumni, he said. GTN is the talent agency that hires speakers for ACCENT.

"Florida Blue Key has a strong financial conflict of interest here. [It] controls ACCENT Speakers and [Greater Talent Network]," Arcenas said. "We thought that people deserve to know this and they deserve to know what The System's doing."

Arcenas believes there is a financial conflict of interest where FBK, the fraternities and sororities have influence over the company ACCENT Speakers conduct business with.

Calendar

No events at this time.

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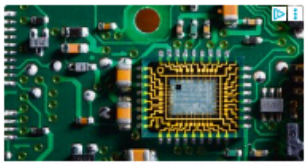

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What did the state say about Gainesville and Alachua County in its DOGE audit?

Florida hockey chasing a chance at postseason berth

No. 5 Florida men's golf nears spring play

The budget of ACCENT runs into the hundreds of thousands of dollars; the most recent activity and service fee budget allocated ACCENT Speakers nearly $500,000 for the 2022-2023 fiscal year.

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Arcenas cited prior reporting by The Alligator, The Gainesville Sun and The Tab showing that the fraternity Alpha Epsilon Pi has historically maintained control over ACCENT Speakers because of a deal made within The System deemed a legacy position.

Digging into the ACCENT contract of Josh Richards, the account examines the representative of United Talent Agency Speakers, the agency with which ACCENT conducts much of its business.

The representative, Arcenas wrote, is a Florida Blue Key, Alpha Epsilon Pi brother and the ACCENT chair from 2004-2005. The representative also started to work for the talent agency in August of 2005.

Arcenas said UTA Speakers acquired GTN in 2017 and the founder of GTN was also a Florida Blue Key, Tau Epsilon Phi brother and ACCENT chair from 1976-1977.

Prior reporting by The Alligator in 1977 stated "ACCENT and SG Entertainment have both been dominated in recent years by members of Tau Epsilon Phi (TEP) and Alpha Epsilon Pi (ΑΕΠi)."

Arcenas alleges he's faced harassment and doxxing threats from members of SG's Vision Party for investigating ACCENT's financial ties to Florida Blue Key and for making parody memes of members in SG.

CEAM
FLAGLER COLLEGE

Kendra Frorup
EXHIBITION WALKTHROUGH
+ OPENING RECEPTION:
Friday, Feb 6 @ 5-8:00 PM

Vision Party affiliates have not publicly addressed the post or claims as of Sept. 24.

"I also hope to see more students waking up and realizing the corruption at their feet right in their backdoor that a political machine has controlled UF politics for a 100 years," Arcenas said.

This is a developing story. Check back for updates.

Contact Vivienne Serret at vserret@alligator.org. Follow them on Twitter @vivienneserret.

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Exhibit 4C: Allegations of Florida Blue Key's conflict of interest within Student Government Productions via UF Politics article

https://medium.com/@uf_politics/bombshell-investigation-exposing-the-1-000-000-student-government-productions-grift-e89d17bee5ce

Student Government Productions: A Theta Chi Legacy Position

Student Government Productions (SGP) is the best funded student government agency. The 2022–23 Activity and Service Fee Budget allocates $825,000 to SGP in FY22–23. Officially, their duty is to "provide a diverse array of music and entertainment to the student body at a free, or reduced cost." Unofficially, they are owned by a single fraternity, Theta Chi.

"Legacy positions" refer to the ownership of student government agencies by a particular Greek house. These deals are worked out in The System, the political machine that has controlled UF politics for over a century. Much like ACCENT Speakers is owned by AEPi, SGP is owned by Theta Chi. Various articles cover the nepotistic relationship between Theta Chi and SGP such as *The Gainesville Sun* in 2010 and *The Alligator* in 2014.

The real grift with SGP, however, lay in its relationship to Gator Growl.

A 2011 *Alligator* article describes how tuition dollars began to be used to subsidize Gator Growl:

> *Gator Growl producer Aaron Heger said Gator Growl staff decided to bring a music act back to the pep rally after a 1,500-student survey indicated that 90 percent of students wanted a music act. There was no music act in 2010, which Heger said was partly a result of expenses…That's when SGP stepped in and offered to sponsor the band to help with costs and advertise SGP to the Student Body, Heger said.*

Since 2011, Student Government Productions (controlled by Florida Blue Key as a legacy position) has spent hundreds of thousands of dollars every year bringing artists to Gator Growl, a FBK-run event. The money spent by SGP on Gator Growl artists is a black box, **shielded from any public scrutiny**. When attempting to public record request contracts related to Gator Growl artists, UF responds "You need to reach out to the President of Florida Blue Key… Florida Blue Key handles Gator Growl & Homecoming, not Student Government."

The only source for the money spent by SGP on Gator Growl artists are statements by FBK. However, in recent years, they've simply refused to disclose the amount of student tuition dollars they've spent on artists.

Gunna and Neon Trees were the music headliners for the event. Florida Blue Key and Student Government Productions did not disclose how much each artist was paid to perform. SG also did not provide how much of the SG budget was spent on the production.

FBK/SGP refused to disclose the amount of student tuition dollars they spent on the 2022 Gator Growl performers.

Even before SGP began to subsidize Gator Growl in 2011, UF Student Government intervened to pour money into directly subsidizing Gator Growl tickets. In 2005, SG spent $140,000 to subsidize tickets after lagging attendance. In the two years before that, SG spent $80,000 and $200,000.

Quantifying the Grift

Through SGP (or SG directly), Florida Blue Key's Gator Growl receives hundreds of thousands of dollars in tuition money every year. After receiving this subsidy, the revenue from Gator Growl is retained by FBK. Based on incomplete records (either due to a lack of reporting or FBK refusing to provide records), **SGP/SG has spent at least $1,395,000 subsidizing FBK's Gator Growl since 2003.**

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Subsidies for FBK's Gator Growl from Student Tuition Funds (Incomplete)

- Gator Growl 2021: FBK/SGP refused to disclose
- Gator Growl 2018: FBK/SGP refused to disclose
- Gator Growl 2017: $180,000 from SGP
- Gator Growl 2016: $230,000 from SGP
- Gator Growl 2015: $160,000 from SGP
- Gator Growl 2014: $210,000 from SGP
- Gator Growl 2011: $71,000 from SGP
- Gator Growl 2005: $140,000 from SG
- Gator Growl 2004: $80,000 from SG
- Gator Growl 2003: $200,000 from SG
- **Total: $1,271,000**

Meanwhile, according to their tax records, FBK routinely makes hundreds of thousands in revenue from Homecoming/Gator Growl every year.

Revenue, Expenses, Profit from Homecoming/Gator Growl According to FBK Tax Records

Fiscal Year Ending June, FBK Revenue, FBK Expenses, FBK Profit

2022, $575,545, $456,795, $118,750

2021, $46,373, $30,660, $15,713

2020, $384,557, $487,834, -$103,277

2019, $532,991, $549,235, -$16,244

2018, $574,748, $550,141, $24,607

2017, $594,152, $586,697, $7,455

Astonishingly, even with hundreds of thousands of student tuition dollars pouring into Gator Growl, FBK still struggles to make a net profit. In two of the last six years, FBK lost money on Gator Growl/Homecoming. The decline of Gator Growl, as stated before, has been decades-long. From 2002 to 2022, attendance sharply dropped from 60,000 to 7,000. Controversies over which comedians and artists to bring has been a long-standing argument between students and alumni. The result has been a steady decline in influence as FBK itself loses relevance in state politics.

In the Bradshaw Papers, numerous FBK insiders discuss financial mismanagement. The result of FBK's sloppy finances is the growth of tapping classes to raise more funds. As tapping classes grow, the prestige of FBK diminishes as more money is thrown into the Gator Growl money pit.

> *"[Florida Blue Key has] really gone downhill in the past several years. They have let a lot of people in, Homecoming and Gator Growl are losing money hand over first…It's got harder to run so no-one really wants to be in charge anymore" (86).*

Exhibit 4D: Media articles on Gator Growl subsidiaries of student tuition dollars received by Florida Blue Key

https://www.gainesville.com/story/news/2005/06/11/gator-growl-loses-funds-in-financial-snafu/31695473007/

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NEWS

Gator Growl loses funds in financial snafu

JANINE YOUNG SIKES Sun staff writer

June 11, 2005, 12:01 a.m. ET

Gator Growl is still a go, but University of Florida students won't get to attend for free.

Patricia Telles-Irvin, UF's vice president for student affairs, approved on Friday less than half of the money - $140,000 of $340,000 - student government planned to give to Florida Blue Key for Gator Growl.

Florida Blue Key leaders believed the organization was in dire financial straits and asked for the money to help fund the world's largest student-run pep rally - an event that had seen lagging student ticket sales in recent years. Organizers worried that without the money they would have had to cut the extravagant affair, which features fireworks, club sketches and nationally known comedians, down to a bare bones production.

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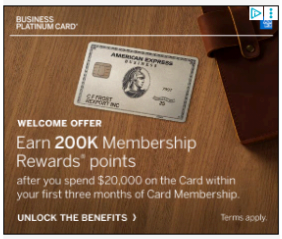
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https://www.alligator.org/article/2011/11/gator-growl-turnout-came-up-short-despite-show-changes

Audience members also enjoyed this year's entertainment, Heger said. Joel McHale, who hosts "The Soup" on E! Entertainment network and acts in NBC's show "Community," performed as the Gator Growl comedian. The Goo Goo Dolls played as the headlining band.

Heger said a 1,500-student survey conducted in the spring indicated that 90 percent of respondents wanted a music act at Gator Growl.

Bringing the Goo Goo Dolls cost $110,000 and bringing McHale cost $85,000, Heger said. Student Government transferred $71,000 from reserve funds to Student Government Productions in September for Gator Growl to put toward the Goo Goo Dolls.

Gator Growl Public Relations Director Cait Feroleto estimated that Gator Growl expenses totaled around $1 million.

Kaitlyn Hosticka, a 23-year-old criminology junior, said she had never heard of McHale before Gator Growl staff announced he would be the comedian.

https://www.alligator.org/article/2014/10/revamped-gator-growl-approaches-performers-paid-210k

NEWS | HOMECOMING

Revamped Gator Growl approaches; performers paid $210K

By Ariana Figueroa
October 14, 2014 | 10:00pm EDT

Emily Johns can't wait to see how UF is going to pull off Gator Growl's first-ever showcase on Flavet Field on Friday.

The 20-year-old marches in the Homecoming Parade every year with her ROTC group and then goes to the concert at night.

Performers for this year's Growl show include Ludacris, Foster the People and former SNL cast member Brooks Wheelan.

"I'm pretty much just going for Ludacris," the UF animal science sophomore said. "It's a cheap concert."

Student Government Productions is paying Ludacris $90,000 to perform and $120,000 for Foster the People, said Jonathan Schonfeld, SGP co-chairman.

In 2011, the Goo Goo Dolls received $110,000 while the Steve Miller Band was paid $160,000 in 2008.

"I think it's going to be way better of a turnout than last year, and the shows are designed for the students," he said.

Haley Doyle, Growl associate producer of communications, said ticket sales are looking well and are higher this year than last year.

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Popular

Parents upset after Alachua County Public Schools installs new fence near school
By Grace Larson | Jan. 25

Over 100 locals gather at

https://www.alligator.org/article/2016/10/waka-flocka-flame-other-performances-a-highlight-for-gator-growl-2016

Renee Hoffner-Dabbs hadn't been to Gator Growl since 1988.

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Now 54, she returned Friday night, wanting to experience the Homecoming event at the same time as her daughter, a UF freshman.

Twenty-eight years later, Hoffner-Dabbs was still impressed.

"When I first heard about all of the changes, I was concerned," said Hoffner-Dabbs, who watched comedian Jerry Seinfeld's routine in Ben Hill Griffin Stadium in 1988. "But this exceeds all expectations. This is a true pep-rally environment."

This year's Gator Growl was held on Flavet Field for the third year and featured performances from country duo Maddie & Tae, pop band Timeflies, rapper Waka Flocka Flame and electronic band Passion Pit.

Student Government Productions paid a combined total of $230,000 for the four acts, according to Robert Felder, the general chairman for Homecoming week and Gator Growl.

Millie Llanes, the executive producer of Gator Growl, said about 11,000 tickets were sold, but about 10,000 people attended. She said the sets of the performers ran on schedule, with the first set starting at 6 p.m. and the last finishing before 10 p. m.

closer to a yearlong pause on H-1B visas
By Leona Masangkay | Jan. 29

The Hamilton School's blind spots, from the perspective of one of its students
By Sasha Morel | Jan. 24

Millhopper Family Dentistry, UF to host free dental clinics in February
By Lily Hartzema | Jan. 25

Calendar

No events at this time.

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https://www.alligator.org/article/2017/10/snoop-dogg-lights-up-the-joint-at-gator-growl

As Snoop Dogg took the stage of Gator Growl at about 8:40 p.m., a plume of marijuana smoke engulfed the audience.

ADVERTISEMENT

To the surprise of some audience members and Millie Llanes, the executive producer of Gator Growl, Snoop Dogg lit something on stage and smoked throughout the entire performance.

"I can't comment on anything about Snoop Dogg," Llanes said. "IIis performance, I thought, was amazing. I can't comment on anything that he had or anything else."

Other Gator Growl organizers and police officers didn't know what Snoop Dogg was smoking on stage and said it may have been a cigar or cigarette.

Toward the end of the show, Snoop Dogg shouted, "Anyone want to smoke with the Dogg tonight?"

Before he concluded with "Young, Wild & Free," Snoop Dogg asked audience members to put their lighters and their phones in the air and sing with him.

Snoop Dogg was paid $130,000, and Daya was paid $50,000, wrote Student Government Productions Chairman Alex DesRosiers in an email.

https://www.alligator.org/article/2018/09/walk-the-moon-is-coming-to-uf

Gator Growl organizers announced Walk the Moon would headline at the UF Homecoming Pep Rally on Nov. 2.

Photo by Courtesy | The Independent Florida Alligator

UF will "shut up and dance" to Walk the Moon at Gator Growl, event organizers announced.

The alt-rock-pop band will headline the UF Homecoming pep rally Nov. 2 on Flavet Field, according to a press release. Andrew Kelly, the Student Government Productions chairman, declined to comment on how much the group is being paid to perform. Other performers have not been announced yet.

Tickets are currently being sold on Ticketmaster and on Turlington Plaza, said Marie Nanney, an event organizer. Students can buy general admission tickets for $15 with a discount code sent to their UF emails and can buy pit passes for $30. Non-UF students can pay $25 for general admission tickets and $50 for pit passes, Nanney said.

Walk the Moon won two Billboard Music Awards in 2016, according to Billboard. Some of the band's top songs include "Shut Up and Dance," "Anna Sun" and "One Foot."

Liliam Clavijo, a 19-year-old UF political science sophomore, was thrilled to hear that Walk the Moon is playing at Gator Growl.

A year ago, she and two friends saw the group perform live at a concert.

https://www.alligator.org/article/2021/10/gator-growl-homecoming

Neon Trees ended its set with their hit song "Everybody Talks," and the crowd screamed the lyrics back to the band so loudly they stopped playing and let the audience take over.

This was UF's second concert event of the semester, following BROCKHAMPTON and Deb Never's appearance organized by SGP Aug. 23, the first day of school.

Homecoming and Gator Growl collaborated with SGP to create a diverse lineup of genres and acts for the event, Brady Alexander, Gator Growl executive producer, wrote in an email.

The goal of inviting Gunna and Neon Trees to perform was to attract different audience demographics, Madeline Wells, the producer of public relations for Homecoming and Gator Growl wrote in an email.

As of the day before the event, over 7,000 tickets were sold out of 7,300 available, Alexander wrote.

Students were excited to add a piece of their college experience back into their lives.

Olivia Burgess, a 21-year-old UF graphic design junior, first attended Gator Growl her freshman year, which she said was exciting.

"It was really disappointing that we didn't get to have one last year," Burgess said. "I think it's really cool that they brought in two headliners. I think they're trying to make up for last year and make it really special for us."

Another major component of homecoming week is the annual homecoming parade. The parade was canceled altogether last year, and people were encouraged to "parade from home" by decorating their properties for the occasion.

But on Oct. 8, traffic stopped, streets were closed, schools were out, and people lined the sidewalks to watch the hour-long parade honoring the Gator Nation once again.

Fire trucks, ambulances and police motorcycles lead the way with dozens of floats, cars and people following.

The event was full of dance performances, marching bands, public figure appearances and more. Each participant was equipped with a smile and wave ready for the parade spectators.

The parade set the bar for the energy sustained throughout the day and into the night at Gator Growl.

Allessandra Inzinna contributed to this report.

Exhibit 4E: Comprehensive article from UF Politics on Florida Blue Key receiving over a million dollars of student tuition dollars in Gator Growl subsidies according to Public Records Requests

https://medium.com/@uf_politics/florida-blue-key-has-taken-two-and-a-half-million-dollars-of-uf-tuition-money-since-2003-92fbcf41abac

Florida Blue Key Has Taken Two and a Half Million Dollars of UF Tuition Money Since 2003

New public records expose how the organization extracts millions of student funds but can anything be done?

UF_Politics Seriousposting Following 6 min read · Jun 20, 2024

1

Last October, I published a piece that exposed Florida Blue Key (FBK) received over a million dollars from student tuition dollars in the form of UF Student Government (UFSG) "Gator Growl subsidies" in the last twenty years. Florida Blue Key, to review, is the leadership honorary society that operates as a shell for the political machine that controls UF Student Government. In short, the political machine that controls UF Student Government also financially extracts tuition dollars for its own benefit.

The original piece worked with public reports from *The Independent Florida Alligator* and *The Gainesville Sun* to calculate a total of $1,271,000 of student tuition dollars had been handed to FBK in the form of Gator Growl subsidies or direct subsidies. Student Government Productions, an agency of UFSG, gave direct transfers ranging in value from $71,000 up to $230,000.

However, after 2018, FBK simply stopped speaking to news outlets about how much money it received from UFSG. As a non-public entity, FBK is also not required to disclose their finances by Florida Sunshine laws, meaning the tuition money they receive is unavailable to public records requests.

After consulting experts familiar with funding within UFSG, they advised me to submit a public records request not against FBK but for Student Activity Requests (SARs) from Student Government Productions to FBK. After months of waiting, I was finally able to receive records that expose the amount of student tuition dollars FBK received since 2012.

The table below showcases the amount of money, the document of the public records request, and the public records request reference ID number for independent verification:

Year, Tuition Money FBK Received via Gator Growl Subsidies, PRR Document, PRR ID Reference Number

2012–13: $150,000, Attached, # W014199–031324

2013–14: $150,000, Attached, # W014198–031324

2014–15: N/A, Attached, # W014197–031324

2015–16: $160,000, Attached, # W014196–031324

2016–17: $253,000, Attached, # W014195–031324

2017–18: $198,000, Attached, # W014194–031324

2018–19: $192,500, Attached, # W013820–122223

2019–20: $200,000, Attached, # W013819–122223

2021–22: $125,000, Attached, # W013818–122223

2022–23: $180,000, Attached, # W013797–122223

2023–24: $210,000, Attached, # W013796–122223

Total: **$1,818,500**

Adjusting the Numbers

The total calculated in the above table, **$1,818,500**, only accounts for public records-verified numbers. The verified numbers confirm much of the previous article's assessment but often exceeded the numbers given to news outlets. For example, SGP Chairman Robert Felder claimed Florida Blue Key only received $230,000 for Gator Growl 2016 but the public records request shows it was actually $253,000 including fees for the agents of Gator Growl artists.

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In addition, the public records request for 2011 and 2014 did not yield any SARs to Florida Blue Key, but public reporting stated that FBK received $71,000 in 2011 and $210,000 in 2014. I also did not receive any public records related to direct subsidies, but public reporting shows that FBK received $200,000 in 2003, $80,000 in 2004, and $140,000 in 2005 in the form of direct subsidies from UFSG.

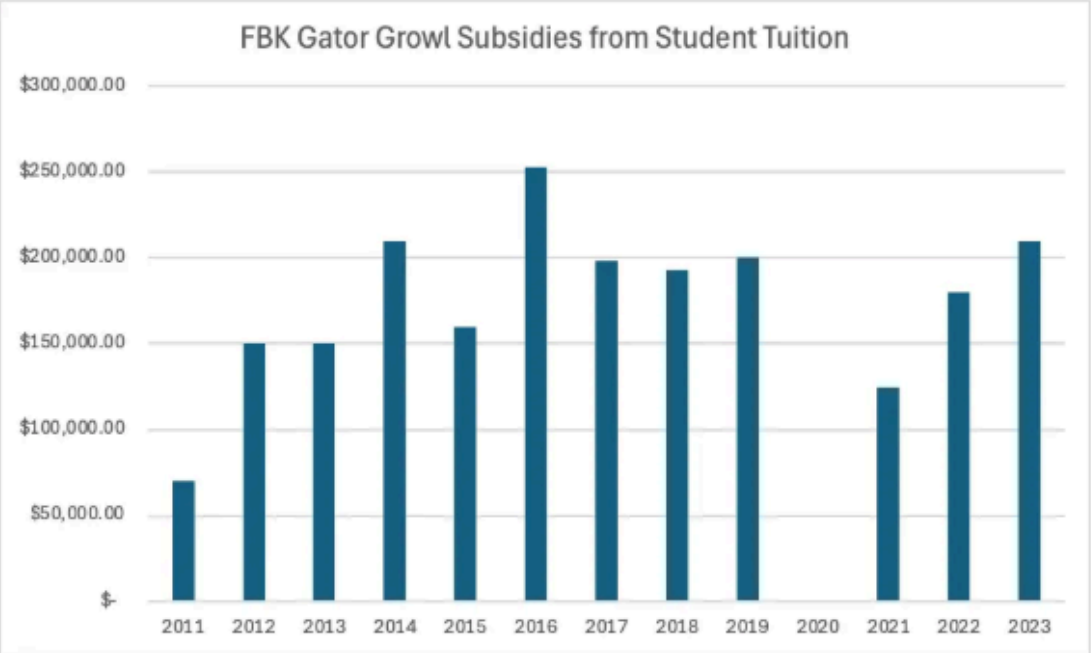
Adjusting the total figure to include these gaps produces the complete total of **$2,519,500** since 2003.

The Grift that Won't Stop Grifting

I encourage readers to look through the attached public records for themselves. With this new information from public records and news reporting, visualizing the amount of money Florida Blue Key has received through Gator Growl subsidies is now possible:

The Grift that Won't Stop Grifting

I encourage readers to look through the attached public records for themselves. With this new information from public records and news reporting, visualizing the amount of money Florida Blue Key has received through Gator Growl subsidies is now possible:



Since Florida Blue Key has started relying on Gator Growl subsidy money in 2011, the amount of student tuition money they've received has been steadily increasing. The amount regularly exceeds $100,000 per year and last year it exceeded $200,000.

These hundreds of thousands of dollars, which UF students entrusted to their student government, is being wasted on subsidizing an organization whose own members recognize is mismanaging its finances. To quote an FBK insider from the Bradshaw Papers:

> *"Blue Key has degenerated because it has become a business and it wants more members. Gator Growl loses hundreds of thousands of dollars every year, and Blue Key is on its way to going bankrupt" (85).*

Exhibit 4F: Comprehensive dossier from UF Politics on Florida Blue Key's control of University of Florida Student Government and alleged financial conflict of interest

https://drive.google.com/file/d/1EzZHw9CPePKTJh29P32zUu6qsW9k1OOb/view

Evidence of Financial Corruption Enacted by Florida Blue Key at the University of Florida

Florida Blue Key is officially a prestigious leadership honorary society at the University of Florida. Unofficially they play a substantial role controlling UF's student government, which manages a budget of over twenty million dollars. Florida Blue Key then leverages this control to extract student tuition dollars for its own financial benefit.

To establish the claims made in this document, I am attaching decades of public reporting, academic papers, and court documents that prove two facts: **(1) Florida Blue Key controls the University of Florida's student government** and **(2) Florida Blue Key leverages this control for its own financial benefit at the cost of tuition dollars.**

The financial manipulation of Florida Blue Key amounts to at least one million dollars in tuition funds directly benefiting the organization through "Gator Growl subsidies." Gator Growl is a pep rally produced by Florida Blue Key. These subsidies for Gator Growl exist in the form of money directly from student government funds (Exhibit 2A) or as funds from the Student Government Productions agency (Exhibit 2B-2F), both of which are funded by tuition dollars.

As a student at the University of Florida, the flagship educational institution of the state of Florida, I am requesting an investigation or measures taken to stop this financial corruption from continuing.

Compiled by Rey Arcenas
Parm Central LLC
politics.uf@gmail.com

2

Fact 1: Florida Blue Key controls the student government of the University of Florida.

Exhibit	Page Number	Description
1A	5	Judicial Notice from *Grapski v. Peter Vlcek, John McGovern, Tony Vu, and Florida Blue Key, Inc.* that determined Florida Blue Key involves itself in UF student government elections through the house and group system.
1B	7	Verdict from *Grapski v. Peter Vlcek et al.* determined FBK guilty of defamation by conspiracy.
1C	8	Affidavit by Clay Martin, a member of FBK, from *Grapski v. Peter Vlcek et. al* admits FBK substantially participates in UF student government elections.
1D	12	Excerpt from 1998 report by *Tampa Bay Times* describing FBK's $85,000 settlement for defaming Charles Grapski during student government elections and acknowledges FBK's domination of UF student politics.
1E	13	Excerpt from 1998 report by the *South Florida Sun Sentinel* describing FBK's intimidation tactics against opposition in student elections including slashing tires and pouring sugar in gas tanks.
1F	16	Excerpt of pages 36-38 of "Power, Patronage and Paternalism in the Gator Nation," a 2013 master's thesis by David Bradshaw. This excerpt includes admissions from FBK members that they whip control inside the student senate and act as "the invisible hand."
1G	19	2012 investigation by *The Independent Florida Alligator* determined that FBK taps members based on deals made by student leaders.
1H	23	Excerpt from 2016 article by *Cosmopolitan* that discusses whistleblower Sabrina Philip, who admits she participated in the political machine that controls UF student government, run by Greek houses and FBK.
1I	25	Excerpt from 2019 reporting by *Tampa Bay Times* that describes FBK as a power broker within UF student government.

3

1J	28	Excerpt from 2004 reporting by *Florida Trend* describing FBK's practice of bloc voting and horse trading to win campus elections.
1K	31	Excerpt from 1992 analysis by *The Independent Florida Alligator* describing FBK secretly running a political machine at the University of Florida.
1L	32	1977 open letter by FBK alumni and former Student Body President Dan Lobeck describes the group system within FBK and how it controls UF student politics.
1M	33	Excerpt from Robert Rivas's 2003 oral history, in which he describes Dan Lobeck's defection from FBK and revelation of FBK's manipulation of student government.
1N	34	Excerpt from 1976 reporting by *The Independent Florida Alligator* describing how power brokers in FBK controls student government and determines student government officials through fraternity bloc voting.
1O	35	Excerpt from 1976 reporting by *The Independent Florida Alligator* acknowledging FBK supports one student government party for political favors.
1P	36	Excerpt from page four of "Impact of Members of Florida Blue Key Upon Florida State Politics," a 1976 honor's thesis by John Watkins, describes the informal group structure of FBK and its control over UF politics.
1Q	38	Excerpt from a 1966 investigation into FBK by *The Florida Alligator* states that they "control the outcome of student body elections and Student Government."
1R	39	1966 column in *The Florida Alligator* states FBK "virtually controls Student Government" and sets up jobs to loyal students.
1S	40	1932 party bulletin by the Primary Progressive Party acknowledges membership in FBK is a prerequisite to many student government positions.
1T	41	2023 report by *The Independent Florida Alligator* shows leaked screenshots exposing chats from Jared Weingard, a member of FBK, orchestrating compulsory voting of Greek life.

4

Fact 2: Florida Blue Key leverages its control over UF's student government for its own financial benefit at the cost of public tuition dollars.

Exhibit	Page Number	Description
2A	43	2005 reporting by *The Gainesville Sun* states FBK received hundreds of thousands of dollars in Gator Growl subsidies from UF Student Government: **$200,000** in 2003, **$80,000** in 2004, and **$140,000** in 2005.
2B	45	2011 reporting by *The Independent Florida Alligator* states FBK received **$71,000** from UF Student Government Productions for Gator Growl.
2C	47	2014 reporting by *The Independent Florida Alligator* states FBK received **$210,000** from UF Student Government Productions for Gator Growl.
2D	48	2015 reporting by *The Independent Florida Alligator* states FBK received **$160,000** from UF Student Government Productions for Gator Growl.
2E	50	2016 reporting by *The Independent Florida Alligator* states FBK received **$230,000** from UF Student Government Productions for Gator Growl.
2F	52	2017 reporting by *The Independent Florida Alligator* states FBK received **$180,000** from UF Student Government Productions for Gator Growl.

- **SET 5: Vision Party is the newest iteration of the System-aligned, FBK-backed party, utilizing the 'I Voted' Sticker Collection Mechanism (Exhibit 5A-5C)**

The **Vision Party** is identified as the current iteration of the FBK-backed political machine. Leaked messages from 2023 show high-level members instructing house representatives to **mandate voting** for all 37 off-campus candidates and to collect "I Voted" stickers as proof. This

sticker collection mechanism is presented as a primary tool for securing the party's continued electoral dominance.

Exhibit 5A: UF Politics special report article on leaked sticker board collection alleged to be beneficial to the FBK-backed Vision Party during Fall 2023 election

https://medium.com/@uf_politics/special-report-sticker-boards-leaked-messages-expose-vision-party-sticker-collection-0a96571b8225

Special Report: Sticker Boards, Leaked Messages Expose Vision Party Sticker Collection

UF_Politics Seriousposting Following 3 min read · Oct 4, 2023

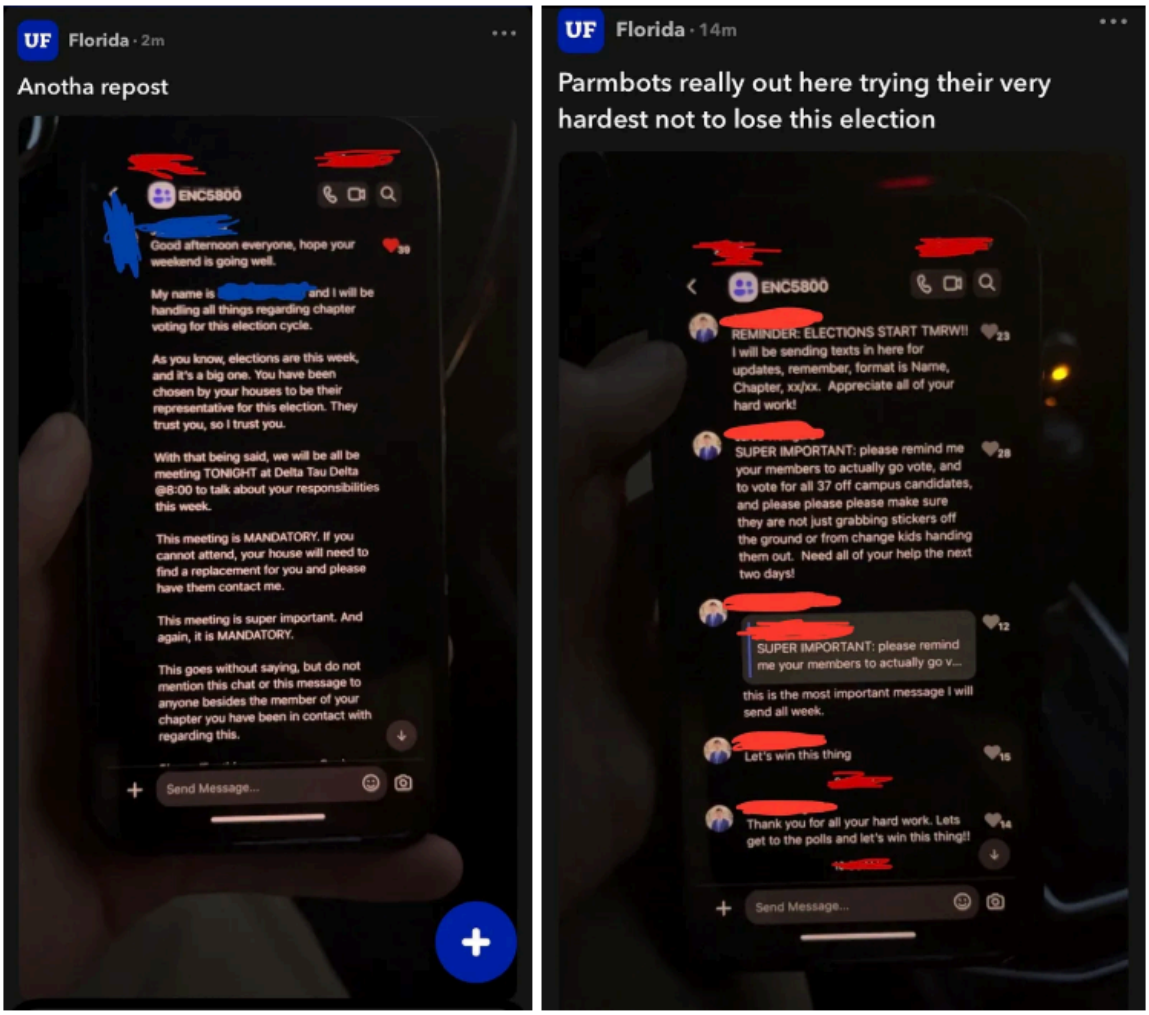
1

The UF_Politics Seriousposting team received an image of a Greek house's sticker board for the fall 2023 elections. The image shows two sheets of paper divided into boxes with names. Each box is filled with an "I Voted" sticker from the first day of elections.

The practice of sticker collection has been well-documented since 2017, when leaked screenshots from Kappa Alpha Theta exposed the message "NO STICKER = NO PARM." The message exposed the practice of withholding food (chicken parmesan) from Theta sisters until they provided their "I Voted" sticker. However, the sticker boards themselves have never been viewed by the public until now.

More recently leaked screenshots exposed high-level Vision Party group chats engaging in sticker collection. The screenshots, leaked yesterday on YikYak, contain following messages from a higher-level member of Florida Blue Key:

> *Good afternoon everyone, hope your weekend is going well. My name is [] and I will be handling all things regarding chapter voting for this election cycle.*
>
> *As you know, elections are this week, and it's a big one. You have been chosen by your houses to be their representative for this election. They trust you, so I trust you.*
>
> *With that being said, we will be all be meeting TONIGHT at Delta Tau Delta @8:00 to talk about your responsibilities this week.*
>
> *This meeting is MANDATORY. If you cannot attend, your house will need to find a replacement for you and please have them contact me.*
>
> *This meeting is super important. And again, it is MANDATORY. This goes without saying, but do not mention this chat or this message to anyone besides the member of your chapter you have been in contact with regarding this.*
>
> *REMINDER: ELECTIONS START TMRW!! I will be sending texts in here for updates, remember, format is Name, Chapter, xx/xx. Appreciate all of your hard work!*
>
> *SUPER IMPORTANT: please remind me your members to actually go vote, and to vote for all 37 off campus candidates, and please please please make sure they are not just grabbing stickers off the ground or from change kids handing them out. Need all of your help the next two days!"*


UF Florida · 2m
Anotha repost
ENC5800
Good afternoon everyone, hope your weekend is going well.
My name is [redacted] and I will be handling all things regarding chapter voting for this election cycle.
As you know, elections are this week, and it's a big one. You have been chosen by your houses to be their representative for this election. They trust you, so I trust you.
With that being said, we will be all be meeting TONIGHT at Delta Tau Delta @8:00 to talk about your responsibilities this week.
This meeting is MANDATORY. If you cannot attend, your house will need to find a replacement for you and please have them contact me.
This meeting is super important. And again, it is MANDATORY.
This goes without saying, but do not mention this chat or this message to anyone besides the member of your chapter you have been in contact with regarding this.
Send Message...
UF Florida · 14m
Parmbots really out here trying their very hardest not to lose this election
ENC5800
REMINDER: ELECTIONS START TMRW!! I will be sending texts in here for updates, remember, format is Name, Chapter, xx/xx. Appreciate all of your hard work!
SUPER IMPORTANT: please remind me your members to actually go vote, and to vote for all 37 off campus candidates, and please please please make sure they are not just grabbing stickers off the ground or from change kids handing them out. Need all of your help the next two days!
SUPER IMPORTANT: please remind me your members to actually go v...
this is the most important message I will send all week.
Let's win this thing
Thank you for all your hard work. Lets get to the polls and let's win this thing!!
Send Message...

The practice of sticker collection, voter coercion of Greek life, and wider student apathy is how the System party traditionally secures election. This year the System party, Vision Party, broke decades of precedent and redrew the maps to their advantage to secure another advantage after losing two elections in a row.

Exhibit 5B: 2023 Independent Alligator article on alleged voter coercion for the Vision Party via leaked messages from FBK member Jared Weingard acting on their behalf

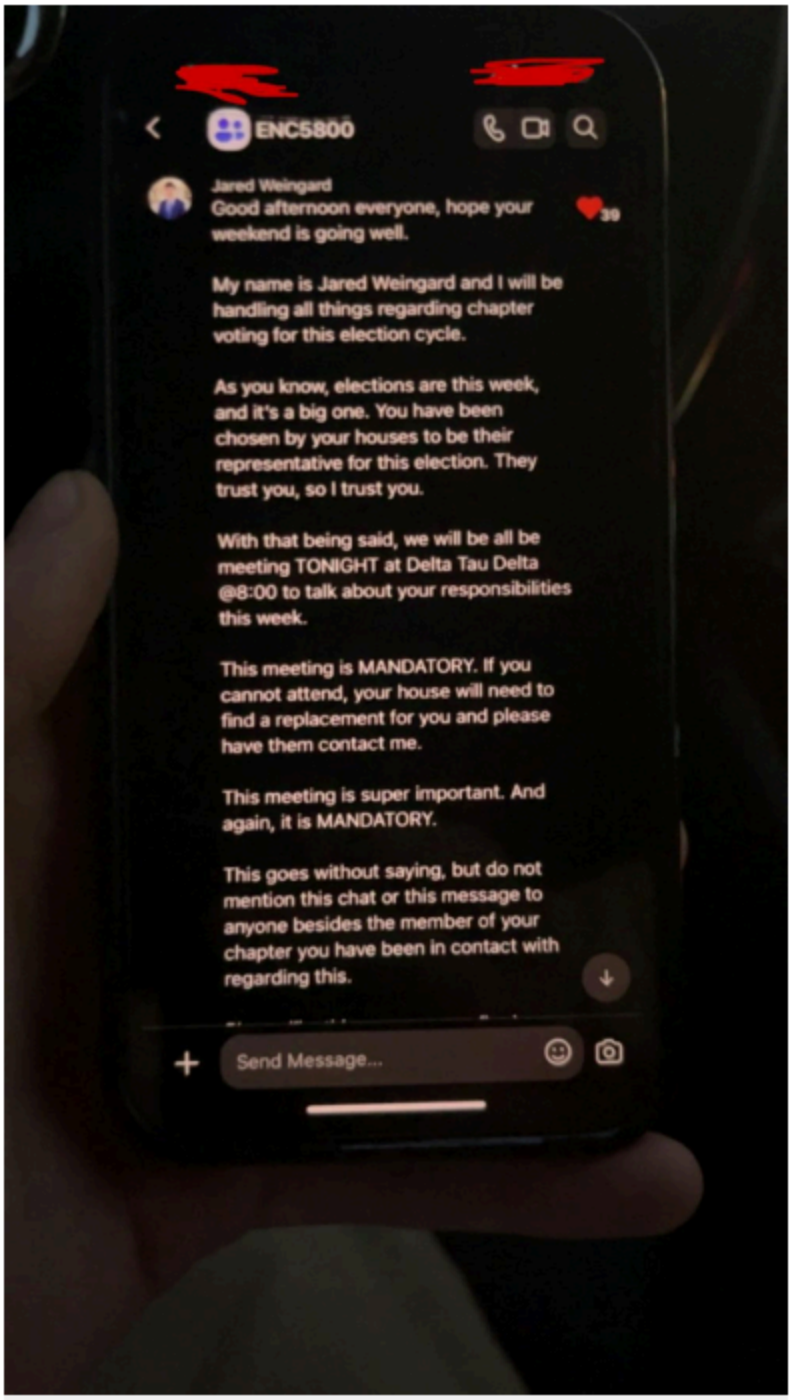
https://www.alligator.org/article/2023/10/leaked-screenshot-alleges-compulsory-election-participation-within-greek-life?ct=content_open&cv=cbox_latest

NEWS | CAMPUS STUDENT GOVERNMENT

Leaked screenshot alleges compulsory election participation within Greek life

Leaked Change Party screenshots also continue to circulate

By Aidan Bush
October 4, 2023 | 9:13pm EDT


ENC5800
Jared Weingard
Good afternoon everyone, hope your weekend is going well.
My name is Jared Weingard and I will be handling all things regarding chapter voting for this election cycle.
As you know, elections are this week, and it's a big one. You have been chosen by your houses to be their representative for this election. They trust you, so I trust you.
With that being said, we will be all be meeting TONIGHT at Delta Tau Delta @8:00 to talk about your responsibilities this week.
This meeting is MANDATORY. If you cannot attend, your house will need to find a replacement for you and please have them contact me.
This meeting is super important. And again, it is MANDATORY.
This goes without saying, but do not mention this chat or this message to anyone besides the member of your chapter you have been in contact with regarding this.
Send Message...

Leaked screenshot as seen on TikTok Tuesday, Oct. 3, 2023.

Popular

Parents upset after Alachua County Public Schools installs new fence near school
By Grace Larson | Jan. 25

Florida overcomes adversity on vault en route to victory
By Seth Haber | Jan. 23

Over 100 locals gather at emergency ICE protest in Gainesville
By Kaitlyn McCormack | Jan. 25

Florida universities are one step closer to a yearlong pause on H-1B visas
By Leona Masanglay | Jan. 29

The Hamilton School's blind spots, from the perspective of one of its students
By Sasha Morel | Jan. 24

Calendar

No events at this time.

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What did the state say about

While UF Student Government Senate candidates will be voted into office Wednesday night, posts on the anonymous social media service YikYak allege mandatory political participation within fraternities.

YikYak posts obtained by The Alligator Tuesday night contained leaked screenshots from the online messenger app GroupMe, which appears to show 22-year-old UF law graduate student Jared Weingard instructing Greek life members on election procedures.

"I will be handling all things regarding chapter voting for this election cycle," he wrote. "As you know, elections are this week, and it's a big one. You have been chosen by your houses to be their representative for this election."

Weingard worked with Florida Blue Key as an associate producer in 2021 and as an executive producer of Gator Growl in 2022.

He later provides details of a required meeting at fraternity house Delta Tau Delta to discuss house representatives' responsibilities.

"This meeting is MANDATORY. If you cannot attend, your house will need to find a replacement for you and please have them contact me," he wrote.

Weingard also asked GroupMe members to ensure their Greek life members voted, with stickers as proof.

"SUPER IMPORTANT: please remind me your members to actually go vote, and to vote for all 37 off campus candidates," Weingard wrote. "Please please please make sure they are not just grabbing stickers off the ground or from change kids handing them out."

Weingard concludes by telling members to not share the message elsewhere. He could not be reached after three phone calls and three messages.

Screenshots of Change Party members' messages — which leaked Sept. 24 — have also surfaced on YikYak, showing a member celebrating the party's condemnation of DEI attacks as a "PR Stunt" on the online messenger app Slack.

Aidan Bush and Vivienne Serret contributed to this report.

Exhibit 5C: UF Politics article on update on alleged voter coercion leaks, FBK member Jared Weingard was passed over for FBK president according to anonymous insiders

https://medium.com/@uf_politics/so-what-happened-after-the-fall-2023-student-government-elections-recap-95418bd411d5

Florida Blue Key: Leadership Shake Up

Florida Blue Key, the organization that runs the political machine behind Vision Party, was exposed for running a sticker collection scheme as well as financial corruption regarding ACCENT Speakers and Student Government Productions. Leaked screenshots showed Jared Weingard, a former executive producer of Gator Growl, instructing a group chat of Greek house representatives to mandate their members to vote.

Florida Blue Key insiders confirmed that Jared Weingard was passed over for a promised position as Florida Blue Key's president.

- **SET 6: Independent Alligator Interviews during 2025 featuring allegations of compulsory voting by sororities in support of the Vision Party establish similar descriptions of voter coercion in 1998 case, academic papers, and the Unite Tapes (Exhibit 6A-6B)**

Interviews conducted during 2025 provide evidence that **compulsory voting** remains a staple of the political environment. Students reported voting for the Vision Party solely because their **sororities required it**, with some admitting they were completely unfamiliar with the party's platform. These accounts mirror the coercive tactics documented in the 1998 Grapski case, the 2010 Unite Tapes, 2013 Bradshaw Master Thesis, and 2025 Arcenas Honors Thesis.

Exhibit 6A: Independent Alligator Interview from Claire Hoover on alleged compulsory voting by her sorority during Spring 2025 election

https://www.alligator.org/article/2025/02/uf-student-elections-live-updates?ct=content_open&cv=cbox_latest

"**Norman Library, 1:52 p.m.**

Claire Hoover, a UF behavioral and cognitive neuroscience senior, said she voted for Vision Party because her sorority required her to. As a transfer student, Hoover said she isn't familiar with student government parties' platforms.

"It's kind of all foreign to me," she said.

– *Olivia Shehadi*”

Exhibit 6B: Alligator Interview from Ellie Roisman on alleged compulsory voting by her sorority, Alpha Epsilon Phi during Fall 2025 election

https://www.alligator.org/article/2025/10/vision-party-sweeps-all-uf-senate-seats?ct=content_open&cv=cbox_featured

"Styka's friend, 18-year-old psychology freshman Ellie Roisman, voted because her mom participated in SG during her time at UF, she said, and because her sorority, Alpha Epsilon Phi, required it. While the chapter told members it usually votes for Vision candidates, Roisman said, it did not ask her to vote in any specific way.”

- **SET 7: Evidence connecting Senate President Maya Idiculla to Chief Justice Hagen Turner via shared membership in Florida Blue Key and running under the FBK-backed Gator Party (Exhibit 7A-7D)**

Exhibits establish a direct link between **Senate President Maya Idiculla** and **Chief Justice Hagen Turner** through their shared membership in Florida Blue Key. Idiculla was part of the Spring 2025 tapping class, while Turner was initiated in Fall 2022. Additionally, both Idiculla and Turner had slated for the FBK-backed Gator Party, the immediate predecessor to the Vision Party, while running for Student Senate seats in Spring 2021 and Spring 2023 respectively. Petitioners argue this shared affiliation constitutes a **prohibited tie** that necessitates recusal in ethics proceedings involving both officials.

Exhibit 7A: Instagram post from official Florida Blue Key account of the official roster of Florida Blue Key’s Tapping Class of Spring 2025 listing Senate President Maya Idiculla’s membership

https://www.instagram.com/p/DIU1sppJ9qZ/

Exhibit 7B: Screenshot of official roster of the Tapping Class of Fall 2022 that shows Chief Justice Hagen Turner's membership in Florida Blue Key

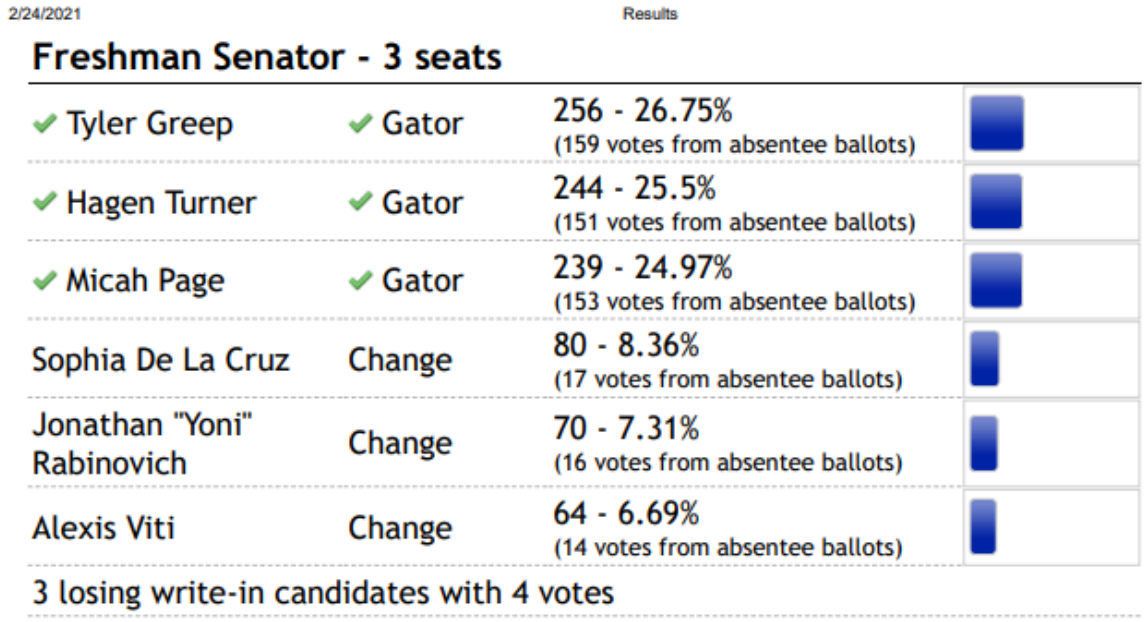
https://drive.google.com/file/d/19V_z3zcfVlB05FyMD8pkVAJr8PuhZZzX/view

Fall 2022 Initiates

Allen, David
Allison, Mason
Arbuckle, Mary Kate
Beltz, Blake
Benatar, Jordan
Bonet, Lauren
Brennan, David
Bruncaj, Dilon
Chung, Anthony
Etienne, Hilton
Gaines, Frederic "Ricky"
Galeano, Noemi
Ghozali, Ethan
Gomez, Natalie
Gorenberg, Aedyn
Gray, Bailly
Hart, Thomas
Higgins, James Michael
Hodge, Samuel
Hylton, Norr
Jetter, Rachel
Kahler, Seth
Kelly, Amantha "Amy"
Leon, Maria
Mabud, Sazzad
McCoy, Blake
McGurk, Reagan
McNally, Drew
Mielke, Morgan
Morantz, Brandon
Munro, William
Page, Henry
Passero, Jack
Pecora, Emily
Potthast, Olivia
Putnam, Elizabeth "Libby"
Roy, Anabelle
Sarnago, Clara
Schneider, Cason
Self, Harper
Siemienas, Kendall
Simpkins, Dorian
Smith, Myla
Spiegelman, Benjamin
Trillo, Claudio
Turner, Hagen
Vaknin, Mara
Valenzuela, Anthony
Zargari, Melody

Exhibit 7C: Spring 2021 election results that show Hagen Turner's membership into the FBK-backed Gator Party as a victorious candidate for the Freshman seat

https://sg.ufl.edu/wp-content/uploads/2024/02/2020-2029-Election-Results-Spring-2024-Update.pdf



2/24/2021 Results

Freshman Senator - 3 seats

✔ Tyler Greep	✔ Gator	256 - 26.75% (159 votes from absentee ballots)	
✔ Hagen Turner	✔ Gator	244 - 25.5% (151 votes from absentee ballots)	
✔ Micah Page	✔ Gator	239 - 24.97% (153 votes from absentee ballots)	
Sophia De La Cruz	Change	80 - 8.36% (17 votes from absentee ballots)	
Jonathan "Yoni" Rabinovich	Change	70 - 7.31% (16 votes from absentee ballots)	
Alexis Viti	Change	64 - 6.69% (14 votes from absentee ballots)	

3 losing write-in candidates with 4 votes

Exhibit 7D: Spring 2023 election results that show Maya Idiculla's membership into the FBK-backed Gator Party as a losing candidate for the College of Liberal Arts and Sciences (CLAS) seat

https://sg.ufl.edu/wp-content/uploads/2024/02/2020-2029-Election-Results-Spring-2024-Update.pdf

Liberal Arts and Sciences Senator - 8 seats

✔ Simone Liang	✔ Change	1609 - 7.7% (6 votes from absentee ballots)	
✔ Caitlyn Mathews	✔ Change	1593 - 7.62% (6 votes from absentee ballots)	
✔ Chalisa Budhai	✔ Change	1585 - 7.58% (5 votes from absentee ballots)	
✔ Jordan LoSardo	✔ Change	1574 - 7.53% (5 votes from absentee ballots)	
✔ Timothy Sinclair	✔ Change	1564 - 7.48% (6 votes from absentee ballots)	
✔ Asif Islam	✔ Change	1553 - 7.43% (5 votes from absentee ballots)	
✔ Andrew Taramykin	✔ Change	1548 - 7.41% (6 votes from absentee ballots)	
✔ Nathaniel Pelton	✔ Change	1541 - 7.37% (5 votes from absentee ballots)	
Kaitlyn Berger	Gator	1126 - 5.39% (3 votes from absentee ballots)	
Maya Idiculla	Gator	1079 - 5.16% (2 votes from absentee ballots)	
Alejandro Grillo	Gator	1048 - 5.01%	

https://vote.sg.ufl.edu/s/admin/Election/Results/83 7/10

3/1/23, 9:01 PM Results

		(2 votes from absentee ballots)	
John Brinkman	Gator	1030 - 4.93% (3 votes from absentee ballots)	
Kenneth Caraballo	Gator	1021 - 4.88% (3 votes from absentee ballots)	
Cole Buffa	Gator	1006 - 4.81% (3 votes from absentee ballots)	
Aaron Sindhu	Gator	998 - 4.77% (2 votes from absentee ballots)	
Aaron Rubaii	Gator	987 - 4.72% (2 votes from absentee ballots)	
Kanye West	WRITE-IN	2 - 0.01%	
Jared Weingard	WRITE-IN	2 - 0.01%	
Jake Greenwell	WRITE-IN	2 - 0.01%	
38 losing write-in candidates with 41 votes			

- **SET 8: Evidence connecting Florida Blue Key to Supreme Court via Part I and II of Bradshaw Masters Thesis (Exhibit 8A-8E)**

The sources detail efforts by Florida Blue Key executives and donors to **pressure Supreme Court Justices** into changing their opinions on controversial cases. Despite historical evidence

from cases, academic papers, newspaper articles, and interviews from former SG officials including former Chief Justice Matt Michel, the Court issued a 2025 decision denying the existence of "The System" as **speculative**, a move Petitioners view as a way to protect the political status quo. This set suggests that the System maintains unchecked control over all stages of election adjudication.

Exhibit 8A: Interview with anonymous Associate Justice within the University of Florida Supreme Court in Bradshaw Master Thesis Part II (Orange, Blue, and Shades of Gray: UF Student Government and the Moral Psychology of Oligarchy) who alleged being threatened by a donor of Florida Blue Key

interest in making a positive difference on campus. I found this puzzling: the same people were also System party leaders whom I knew to be active participants in a style of politics that I find abhorrent. The personal impressions I had of these people simply did not fit with their behavior in Student Government.

Two examples might serve to illustrate this conundrum. The first relates to an incident from September 2012 that I recounted in my first paper, in which an Associate Justice of the Supreme Court of the Student Body claims he was pressured by a leading member of Florida Blue Key to change his opinion on a controversial case. The Court had decided to approve the text of a proposed referendum question for the upcoming Student Government election, but the Blue Key executive apparently demanded that the decision be reversed because FBK donors did not approve. This alone seemed shocking: the notion that a Florida Blue Key leader would try to subvert the process of allowing the student body to express its democratic will appeared to confirm the worst rumors about the organization's involvement in campus politics. However, an extra detail that I learned about the executive in question was one that I found truly mind-boggling: according to the Associate Justice who told me about this incident, the same FBK member had spent the previous summer in Washington D.C. working for the Democratic Party's task force against voter suppression! Of all the double standards I had encountered among participants in the System, this was surely the most outrageous: how could someone rationalize to themselves or anyone else that the democratic values for which they fought during the summer should be cast aside so readily in the fall?

Exhibit 8B: Interview with former Chief Justice Matt Michel of the University of Florida Supreme Court collaborating the existence of 'the System'

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Florida Alligator, the popular student-run daily newspaper at UF known more commonly as simply the *Alligator*.[20] That is not to say that different concentrations of power do not still exist within the System – on the contrary, new divisions in the System have formed in recent years and there continues to be a substantial amount of internal wrangling for superiority between the different groups (now internally referred to as "blocs") that have emerged post-2004, even if all sides are determined to resolve those differences internally by election season. According to Nick Stinnett, such divisions are probably inevitable: "It would be unmanageable for one house to control everybody... everyone else would be trying to pick them off."[21] As a result, power naturally diffuses so that no one fraternity or sorority enjoys unchecked power.

Even if this explanation goes some way towards logically explaining *why* blocs continue to exist within the System, it does little to explain *how* those blocs form. Why do particular houses choose to join with each other? According to Matt Michel, a UF Supreme Court Justice who has been involved with Student Government for over five years, the most likely explanation is that alliances are based on social bonds that gradually develop between the members of different houses:

> *"I think honestly most of it is just built on personal affinity between the individual leaders. If the people involved have a lot of interactions with another house, whether because they're physically near them or because they group up and have annual events... I think that when you have enough of those contacts going on over a sustained period of time, everybody involved just sort of gets into the mindset that 'we're with this group. We associate with house A, B, C.' And that translates over into 'Yes, of course, we will push for your candidates that you are putting out there because we know you're going to push for ours as well.'"*[22]

[20] Flechas 2012
[21] Author interview with Nick Stinnett, Oct 2013
[22] Author interview with Matt Michel, Oct 2013

Exhibit 8C: Excerpt from Section 6 of Bradshaw Master Thesis Part I 'Carrots, sticks, and dirty tricks' that covers Blue Key leadership allegedly threatening an Associate Justice to retract support on a case that allowed a referendum question for the J. Wayne Reitz Union to be renamed

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6. Carrots, sticks, and dirty tricks

Blue Key's involvement in campus politics seems to be beyond any reasonable doubt – but what exactly does that involvement look like? Do the leaders of Blue Key routinely intervene directly in the day-to-day running of Student Government or is their influence more subtle? The answer appears to be a bit of both. In terms of direct involvement, I found some historical accusations of apparent interference in Student Government by Blue Key officials. The most explicit of these was a claim in 1991 by then-*Alligator* editor Geoff Boucher that when he had been reporting on the Student Senate for the newspaper, "he saw Blue Key operatives standing in back signaling thumbs-up and thumbs-down to orchestrate voting."[85] Perhaps more interestingly, my own interviews uncovered three much more recent claims of direct involvement in Student Government affairs by high-ranking members of Blue Key leadership. The first involved a former Associate Justice of the Supreme Court who, speaking to me on condition of anonymity, claimed that in fall 2012 (while he was still on the Court) a member of the Blue Key executive board called him after the Court approved the text of a non-binding[86] referendum question to be placed on the ballot at the forthcoming election. The question, which asked students whether they supported the renaming of the student union, was presented by independent party Senator Ford Dwyer in light of evidence he uncovered that J.Wayne Reitz, the former UF President after whom the union is currently named, opposed racial integration of the university during his tenure and participated in a "witch-hunt" against gay students and faculty. The Blue Key executive allegedly demanded that the Associate Justice retract his support of the Court's decision, on the grounds that several important Blue Key donors were against the renaming.[87] During the hearing

[85] Douthat 1991
[86] By "non-binding", I mean that a "Yes" vote in the referendum would not have resulted in the automatic renaming of the union because it would not have had force of law. Rather, it would have been a statement of the student body's feelings on the issue.
[87] The controversy surrounding this referendum question is one to which I return later in this work, when investigating the threats that System politicians make against their opponents. There is also more to be said about this specific incident involving the Associate Justice and the Blue Key executive – I revisit this at the beginning of my second paper.

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at which the decision in question was made, objections to the wording of the referendum question had been made on behalf of the System by a student called Ariana Alfonso, whose father had been the chair of the university's governing Board of Trustees until earlier that year.[88]

A second recent instance of direct Blue Key involvement in Student Government politics reportedly took place in early 2013. Ben Meyers, who was elected as Student Body President in February 2011 but resigned before the end of his term[89], was planning to run for the office again in 2013 and had started to build some support within the System. His main rival was Christina Bonarrigo, the girlfriend of the incumbent president TJ Villamil and a member of Zeta Tau Alpha sorority. According to Meyers, he was contacted by FBK president Dana Somerstein in January 2013 because Somerstein "saw it as her responsibility as Blue Key president to maintain the System."[90] She asked Meyers to attend a meeting with Bonarrigo to resolve the issue and hopefully ensure that the System was united at the election. Meyers made it clear before the proposed meeting that he was adamant about running, and the only compromise he would accept was a suggestion that Bonarrigo be his treasurer candidate in 2013, in exchange for his full support if she ran for the Student Body Presidency in 2014. After hearing of his stance, Somerstein apparently delayed seeing Meyers and Bonarrigo until after a Blue Key meeting the following week. At that Blue Key meeting, Meyers says that FBK leadership took action to undermine his coalition: several members of Delta Tau Delta (or "Delt") – an influential fraternity from the political bloc that had pledged its support to Meyers – were not approved for major positions relating to Homecoming and Gator Growl which they had previously been

[88] Crabbe 2012
[89] The circumstances surrounding Meyers' resignation have never been entirely clear. During my involvement in Student Government I often heard rumors that he had been forced from office after being blackmailed for some reason by people in other blocs. However, I have not been able to substantiate those rumors, and Meyers himself declined the opportunity to discuss his resignation when I asked him about it during our interview.
[90] Author interview with Ben Meyers, Oct 2013

Exhibit 8D: Excerpt from Section 7 of Bradshaw Master Thesis Part I 'Choosing the rules and picking the referees' on how Florida Blue Key's influence over the Supreme Court and Elections Commission allows for systemic control over the electoral process to benefit the FBK-backed party

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7. Choosing the rules and picking the referees

It seems to me that one of the principal advantages enjoyed by the System is that every one of the people with responsibility for adjudicating Student Government elections is chosen, either directly or indirectly, by the majority party. The Student Body Constitution provides little guidance in terms of how elections must be conducted; instead, that responsibility is left to the Student Senate through its responsibility for the Student Body Statutes, or "codes", that govern all three branches of government. Unlike constitutional amendments, which require a 60% majority of all those who vote in a referendum of the entire student body[144], most of the codes can be amended by a simple majority vote in the Senate.[145] This includes the "700 codes" (so named because each regulation listed in this section is given a number between 700 and 799) that govern the conduct of elections.

Under the current terms of the 700 codes, there are three levels of adjudication in Student Government elections. The first of these is the Supervisor of Elections, who is appointed annually "by nomination of the Student Body President, subject to the approval of a two-thirds vote of the Student Senate."[146] The Supervisor of Elections, along with at least four Assistant Supervisors whom she nominates – subject again to a two-thirds vote in the Senate – is responsible for the administration of the election: this includes ensuring that only eligible candidates are placed on the ballot, ensuring that the polling locations are operated in a fair way, and reporting any possible violations of campaigning rules by candidates or their supporters to

[144] UF Student Body Constitution, Article VIII, Section 4. From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.
[145] Student Body Statute 302.1. From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.
[146] Student Body Statute 711.0. From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.

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the Elections Commission.[147] Given the manner in which the Supervisor of Elections is appointed, it is perhaps no surprise that the office-holder is normally someone with ties to the Student Body President and the System. Nick Stinnett confirmed that this is the case, but denied that it has much practical effect on the conduct of the election. He said that "they [the Supervisor] are one of us, but they can't actually do anything. Polls are worked by poll workers, not election officials. The Supervisor's role is limited to charging people with violations - beyond that, they really don't have any power."[148]

This claim is contrary to a belief that I found to be common in the independent movement – namely that the Supervisor of Elections helps the System party by providing regular updates of the distribution of votes throughout the two days of voting. Stinnett pointed out in our interview that this would never have been possible: in past years when paper ballots were used, none of the votes were counted until after the second day of voting, while more recently the only person with access to the electronic voting system is the IT administrator for Student Government. Both parties are provided with the total number of votes cast after the first day of elections but, as far as I am aware, the System party receives no more information in that regard than does the opposition. Of course, it is hypothetically possible that the IT administrator would break election rules to provide the System party with regular updates, but I found no evidence of that happening. Indeed, Alex Cornillie told me that during his election he was comfortable that the electronic voting system was being administered fairly and, in any case, there was little he could do if even the university employees were involved in conspiring to rig an election: "I was in the

[147] See Chapter 710 of Student Body Statutes – The Supervisor of Elections Act. In particular statutes 711.2, 712.0, 713.3, 713.31. From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.
[148] Author interview with Nick Stinnett, Oct 2013

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room when they were tallying the votes electronically, and they were explaining that it was the same kind of thing that countries used to count carbon credits. There's no getting in it before the final vote count. And I was like, 'OK, well, I believe that.' I mean, if even the IT administrator is lying to me for some… election in Student Government, forget it. Who cares at that point? So I just believe him."[149]

The second level of adjudication in elections is the Elections Commission. This is a body comprised of six individuals: two nominated by the Student Body President, two by the Senate President, and two by the Chief Justice of the Supreme Court. All nominations are subject to a two-thirds confirmation vote in the Senate.[150] In theory, of course, the fact that each of the three branches of government nominates members to the Elections Commission makes it nonpartisan in the sense that no individual has sole power over the nominations. In practice, given the regularity with which the System party holds the Student Body Presidency and a large majority in the Senate, the System party is able to nominate at least four of the six members of the Commission. The Elections Commission's main responsibility is to decide the merits of any complaints about code violations filed by the Supervisor and his assistants, the candidates and their parties, or any other member of the student body. The Commission "may formally recommend to the Supreme Court that the candidate or political party be disqualified. Only the Supreme Court shall have the power to remove a candidate's name from the ballot,"[151] except for in the case of the Supervisor of Elections removing a name from the ballot due to ineligibility.

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[149] Author interview with Alex Cornillie, Oct 2013
[150] Student Body Statute 721.1. From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.
[151] Student Body Statute 723.1. From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.

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As suggested by the code quoted above, the Supreme Court of the Student Body is the third and final level of adjudication for Student Government elections. As mentioned at the start of this work, the Court is comprised of seven students appointed by the Student Body President and confirmed by a two-thirds vote in the Senate.[152] After appointment, they serve until they resign, are impeached, or graduate and cease to be a member of the student body. However, because the academic requirements stipulated for the position tend to ensure that most Supreme Court Justices are in at least their second year of law school when appointed, there is a fairly high turnover of membership on the Court. This means that almost every Student Body President is able to nominate one or more Supreme Court Justices during their term in office. Of course, this process is not unique to Student Government – the United States Supreme Court follows a similar procedure for appointing members – but, as with the Supervisor of Elections and the Elections Commission, the perennial dominance of one party over campus politics ensures that the System has a monopoly on appointments to the Court. This means that, unless an opposition party has more than one-third of the seats in the Senate, the System party has unchecked control over appointments to all three stages of adjudication in the Student Government election process.

According to Matt Michel, an Associate Justice who served as Chief Justice until mid-2013, the Court "pretty much exclusively deal[s] with election-related issues. Any decision by the Elections Commission can be appealed directly to us, and we can also issue injunctions telling Student Government officials to do something or not to do something."[153] Michel said that during his time on the Court, one of the biggest cases brought to it related to a complaint by the independent party that voters were being mistakenly assigned to the wrong zip code in the fall

[152] UF Student Body Constitution, Article V, Section 3(e). From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.
[153] Author interview with Matt Michel, Oct 2013

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2011 Senate elections, when the seats being contested were assigned according to geographical constituency. Interestingly, this case actually raised the question of whether the Supreme Court really *does* have the final word on election issues. The Constitution specifies that the Senate shall "be the sole judge of the validity of election results"[154], meaning that when the Court issued a temporary injunction on the Senate to prohibit it from validating the election results while the issue was investigated, Michel was not sure that the Senate was obliged to comply. At the time, members of the Court including Michel argued that if the Senate had absolute authority in validating elections then the existence of an Elections Commission and a Supervisor of Elections was ultimately pointless because the Senate could override all of them. "The metaphor we used the most was that it would be like the fox guarding the henhouse," said Michel. "The Senate, thank God, honored [the injunction] and postponed validation. If they had gone ahead and validated, I don't know what we would have done. We don't have a judicial army at our command to enforce our decrees!"[155]

I find the situation of the Supreme Court to be worryingly illustrative of a problem that permeates all three branches of government in a system such as that of UF's Student Government where one party has been able to establish almost permanent dominance over the institution: there is ultimately no formal protection against the System imposing whatever kind of rules it wants on how Student Government operates. In the event that the Student Body President's party has a supermajority of two-thirds in the Senate, there is essentially no means of stopping it from imposing its will on the way in which Student Government operates. The only two entities within Student Government which could constrain this dominance are ill-equipped to do so: the first

[154] UF Student Body Constitution, Article III, Section 6(e). From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.
[155] Author interview with Matt Michel, Oct 2013

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entity would be a strong opposition that was able to consistently hold at least 34 of the 100 seats in the Senate or had a realistic chance of winning the executive branch elections. Neither of these occurrences is impossible, but opposition parties have to compete with the complex system of patronage described in earlier sections of this work. This makes their chances of success slim. The second entity that could provide a check on the power of the System is the Supreme Court, but for the reasons just described, it is often unlikely to do so. Given the System dominance of the other two branches of government, there is a strong possibility that people appointed to the Court may be sympathetic to the System, and in any case, the scope of the Court's jurisdiction seems tenuous with regard to elections because of the Senate holding the sole power to validate results.

With the opposition parties and the judicial branch of Student Government unable to provide adequate constraints, both the executive and the legislature have effectively been able to do as they please. I have already explained how this manifests itself in terms of the executive branch: it has often resulted in a near-total absence of scrutiny for appointments to cabinet positions and heads of executive agencies – hence why so many important roles are able to be allocated as legacy positions or as part of a deal between bloc leaders, rather than being based on merit. I now want to say a little more about how this lack of scrutiny affects the way in which the Senate operates, in particular with regard to Senate appointments and the 700 codes that govern elections.

One might think that in a democratic legislature there would be relatively few situations in which an elected representative could be forcibly removed from office before her term

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next Senate meeting Waldman did not deny that she was with Tiemeier when the incident happened, nor that she failed to speak up when her party accused the newspaper of falsifying the story, but she nonetheless uttered the same response repeatedly when questioned by opposition senators: "I counseled Jason not to do it. He agreed. I thought I acted very responsibly."[162] At the time of this incident Waldman was, amusingly enough, a member of the Rules and Ethics Committee. Rather than being removed from that position, she was promoted to chair of the Allocations Committee.[163]

The reason that these kinds of practices are possible is that they are not expressly prohibited by the Student Body Constitution – instead, the Senate is able to set most of its own rules via the Student Body Statutes. The Senate thus has considerable freedom to amend the codes, needing only a simple majority vote to amend many parts of Student Body law. As I explained above, one result of this has been a distinctly paternalistic and undemocratic mechanism for ejecting and replacing senators – rather than allowing voters to decide for themselves whether their elected representatives are doing a good job, the Senate asserts that it should be able to decide unilaterally whether the person elected by the voters to represent them is doing a good job, and if not, to replace that senator with someone who will be appointed without another election.

A similarly paternalistic streak is apparent in the way that the Senate regulates freedom of speech for candidates and parties seeking office during Student Government elections. The 700

[162] Lennon and Shavell 2012
[163] A very similar incident also happened in spring 2013, after I had left the Senate. The *Alligator* published a story about a leaked e-mail that System party campaigner Leah Miller had sent to the house reps of different fraternities and sororities asking them to collect "I Voted" stickers from their members and to donate money to the party's election campaign. At the end of the e-mail she wrote "DELETE THIS AFTER YOU GET THE INFORMATION!! WE CAN'T HAVE ANYTHING ON RECORD! Sketchy, but do it! Thanks!" Despite this controversy, she was elected as a replacement senator soon after the election and shortly thereafter appointed to the Rules and Ethics Committee. See Wright 2013.

codes define campaigning as "any intentional action in support of, or in opposition to, a candidate or political party for an elective student body office, including, but not limited to the distribution of literature and posting of election-specific materials."[164] They then specify that campaigning begins four weeks before an election[165], thus implying that campaigning is not permitted at any other time outside of this four-week window. Throughout my involvement in Student Government, I took serious issue with this rule: I thought that it was a violation of students' First Amendment rights under the U.S. Constitution – never mind the Student Body Constitution[166] – to stipulate that any support of a candidate or party more than four weeks before an election could be deemed an election violation. It meant, at least theoretically, that if I told a friend in December that he should vote for me in February then my entire party's slate of candidates could potentially be disqualified. In September 2012 I took this case to the Supreme Court of the Student Body, which ruled that it was not able to rule on whether Student Body laws violated students' rights under state or federal law. In essence, as I wrote in a letter to the *Alligator* that was published on September 24th 2012:

> *"[The Court is] saying, 'Sure, your right to free speech may well have been horribly violated. If you think that's the case, go to a district court outside of UF because we can't help you.' That's all well and good, except that most students would have no idea of how to appeal to a district court and even if they did, it is prohibitively expensive. In any case, a district court might take years to hear the case or never hear it at all."*[167]

In fact, a federal court with jurisdiction over the state of Florida had already heard a similar case thirteen years earlier which potentially settles the issue. In 1989, the U.S. Court of

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[164] Student Body Statute 700.4d. The same statute provides a few exceptions that are not to be considered as "campaigning", such as "maintaining a website excluded to providing general information about the party and party members, or wearing… a campaign shirt, a button, an emblem or similar paraphernalia." From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.

[165] Student Body Statute761.1. The length of time allowed for campaigning has varied considerably in recent years – in the summer of 2012 it was changed to allow only one week of campaigning before an election, but after pressure from the independent party, the rule was changed again a few months later.

[166] Article I, Section 2 of the Student Body Constitution stipulates that "every student is guaranteed certain rights under the constitutions and laws of the United States and State of Florida. Student Government recognizes these rights." From University of Florida Student Government. "Constitution". http://www.sg.ufl.edu/GovernmentBranches/Judicial/Constitution, accessed Oct 3rd 2013.

[167] Bradshaw 2012

Exhibit 8E: University of Florida Supreme Court decision denying the existence of 'the System' as speculative in a 2025 case '*In re Political Discrimination and Apportionment Case*'

UNIVERSITY OF FLORIDA SUPREME COURT
Decided January 27, 2025

In re Political Discrimination and Apportionment Case

MILLER, J. delivers the opinion of the Court.

THIS MATTER comes before the Court upon a petition filed under Article V, Section 3(b)(2) of the Student Body Constitution, requesting that the Court order the UF Senate Judiciary Committee to "refrain from voter dilution in its apportionment of the Senate's Fall Class." This Court denies this request for relief, finding that this case be dismissed on the grounds that it is precluded by this Court's decision in *In re Fall 2024 Election Map Case*, 4 S.C. __ (September 30, 2024) and *Stephens et al. v. University of Florida Student Government*, 4 S.C. __ (September 30, 2024). *See Sup. Ct. Rules of Prac. & Proc. Rule 3.5*.

The matter at hand involves both the same Petitioner and the same issue from the case *In re Fall 2024 Election Map Case*. The Petitioner attempts to distinguish the instant case by referring to the particular subsects of the student population as "the System" and "the Indies," instead of referring to the "political minorities" or "minority party," as he previously did in *In re Fall 2024 Election Map Case*. Unfortunately, the Petitioner's choice to redefine the "minority" and "majority" parties and coin them with his own personal terms of art is not enough to render them politically cohesive populations.[1] Nowhere did Petitioner show that the separate and distinct parties in the minority over the years referred to themselves collectively as "the Indies" nor that the separate and distinct parties consistently in the majority refer to themselves collectively as "the System." In fact, and more importantly, they never referred to themselves collectively *at all*.

The Petitioner also attempts to argue that over time, "the Indies" have consistently held a "unifying political stance" of supporting online voting and opposing the "'I Voted' sticker collection scheme." The Court finds that a group supporting online voting and opposing the collection of "I Voted" stickers does not establish a "politically cohesive" minority population under the second prong of *Thornburg v. Gingles*.

Even assuming that "pro-online voting" is a belief that conceivably could be discriminated against, Petitioner is attempting to argue that it is a *consolidated* belief held by the so-called "independent movement" in a particular region. This requires multiple speculative leaps that this Court is not at the liberty to take in as serious of a claim as voter dilution. This Petitioner is merely cherry-picking a subset of parties that have existed across the past seven years and

[1] A voter dilution claim requires a petitioner to show that: "(1) a minority population is 'sufficiently large and geographically compact to constitute a majority in a single-member district'; (2) *the minority population is 'politically cohesive'*; and (3) the majority population 'votes sufficiently as a bloc to enable it . . . usually to defeat the minority's preferred candidate.'" *In re Senate Joint Resol. of Legis. Apportionment 1176*, 83 So. 3d 597, 622 (Fla. 2012) (quoting *Thornburg v. Gingles*, 478 U.S. 30, 50–51 (1986)) (emphasis added).

coalescing them into what he has termed "the Indies," an umbrella term the different minority parties have never used to refer to themselves.

The fact that Petitioner has attempted to unsuccessfully institute online voting and that certain minority parties mirror Petitioner's electoral administrative goal in no way indicates that either Petitioner or these parties are experiencing any form of discrimination. The Court is not a remedy-dispensing machine designed to push through individuals' policy goals that they are unable to push through via the appropriate political methods.

And the Petitioner's continual invoking of an "Independent Movement" is itself oxymoronic and suffers from the same shortcomings his argument did in *In re Fall 2024 Election Map Case*. Yet again, "[b]y ruling for Petitioner, we would be effectively designating the result of an election, or the numerical comparison to a different political party, as a 'political opinion.' Consistently non-majority is simply not a political opinion—it is a result." *In re Fall 2024 Election Map Case*, 4 S.C. __ (September 30, 2024). Even if there was an ascertainable political belief at issue here, it isn't demonstrably consistent across time in the way Petitioner is attempting to claim. The fact that one minor position is held by different parties composed of different individuals across different times makes their population neither *independent* nor a *movement*. In fact, in student government politics, different and even competing parties can (and often do) share the same or similar platform points over the years. Many student government political parties at the University of Florida have supported 24/7 libraries over the years. Does this indicate that they are all part of the same politically cohesive conglomerate? Surely not.

The Court assumes for the purposes of this particular case that "supporting online voting" and "opposing the collection of 'I Voted' stickers" do not constitute ascertainable, concrete political opinions.[2] These positions are administrative and procedural in nature, addressing the mechanics and processes of voting rather than any ideological preference.

Once again, Petitioner is "asking the Court to make the dangerous assumption that different political minorities with different platforms, names, members, and brands are one 'politically cohesive' minority group." *In re Fall 2024 Election Map Case*, 4 S.C. __ (September 30, 2024). That is outside the scope of this Court's authority.

The Court noted in *Stephens et al. v. University of Florida Student Government* that "student government apportionment process is neutral and does not account for political affiliations . . . . In fact, the Student Senate is not privy to this level of private information about students. Rather, the Senate relies solely on zip code data provided by the Office of the University Registrar, which is limited to basic geographic information about students. Without access to private student data, such a claim of intentional discrimination or voter dilution remains speculative." *Stephens et al. v.*

[2] The question of the constitutionality of online voting or any "'I Voted' sticker scheme" is not before this Court.

University of Florida Student Government, 4 S.C. __ (September 30, 2024). Thus, keeping in line with that decision, Petitioner's claims remain just that—speculative.

Accordingly, it is hereby ORDERED that:

1. This case is DISMISSED with prejudice, as it pertains to a matter that has already been definitively answered by the Court in *In re Fall 2024 Election Map Case* and *Stephens et al. v. University of Florida Student Government*.

It is so ordered.

DEAS, C.J., KENDRICK, J., MCCLAY, J., and POTTHAST, J., concurring.

- **SET 9: The prevention of the Indies via Change Party taking control of the Student Senate to pass budgetary reforms, and the implementation and maintenance of an at-Large, off-campus district in 2023 has benefitted Florida Blue Key for continued electoral dominance in the Student Senate via Vision Party (Exhibit 9A-9T)**

The implementation of an **at-Large, off-campus district** in 2023 is described as a strategic move to restore FBK's dominance after an indie party won a Senate majority. The Supreme Court overturned the multi-district model after decades of precedence while the FBK-backed Gator Party quorum busted to force the indie-aligned Change Party to **compromise control** of the legislature, **preventing passage** of their apportionment and budgetary amendments. Then, the Supreme Court implemented an at-Large, off-campus district through an **injunction**, allowing the new FBK-backed party, the Vision Party, to win **every off-campus seat** in subsequent elections. In subsequent apportionment sessions, the Vision Party has justified the maintenance of the at-Large, off campus district due to **lack of data** from the Registrar's Office as advised for the Student Senate Judiciary Committee to collect under **Student Body Statute 322.51**. This structural change ensures the Vision Party retains the **majority** necessary to control the Student Government budget, benefitting the **alleged monetary conflict of interest** held by Florida Blue Key.

Exhibit 9A: 2022 Independent Alligator article on the prelude to the 2023 Spring election where the minority 'indie' party Change Party won a majority of the 50 seats in the Fall 2022 election with many seats from off-campus districts, District C and District D, amid growing anti-FBK sentiment against the FBK-backed Gator Party

https://www.alligator.org/article/2022/10/change-party-wins-majority-in-student-government?ct=content_open&cv=cbox_latest

NEWS | CAMPUS STUDENT GOVERNMENT

'Turning of the tide': Change Party wins big in Student Government Fall election

Gator won 22 seats to Change's 27 seats

By Alligator Staff report
October 4, 2022 | 12:52am EDT

Members of Change Party celebrate several district wins in the Senate at the Reitz Union, Monday, Oct. 3, 2022. Change Party won 27 seats and Gator Party won 22.

Photo by Sophia Abolfathi | The Independent Florida Alligator

Change Party beat out Gator Party Monday night, gaining a majority of the 50 Senate seats up for grabs in the Fall 2022 Student Government election — a victory that could signal a shift in the UF electorate for semesters to come.

Though Change was five candidates short of a full slate, it won 27 seats in the Fall election, overcoming Gator's 22-seat grab and reducing its Senate supermajority. Liberation Party didn't claim any seats.

Change will still maintain the Senate minority caucus with nearly a third of the seats.

Faith Corbett, minority caucus leader and Change campaign manager, said she was worried Change would lose seats rather than gain. Afterwards, she said the Change win was proof that wasn't the case: Monday was the first time a minority party has won a majority of seats up for election since Change's inception in 2020.

"It's definitely a moment to celebrate," she said. "This is unprecedented."

Gator still holds the majority in the Senate, but Change now holds 31 seats. If Change maintains its momentum, it could position itself for a possible executive ticket win or gain a Senate majority.

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By Maria Arruda and Kaitlyn McCormack | Jan. 30

Gainesville RTS cancels contract with disability van service, launches in-house app
By Maria Arruda | Jan. 28

Florida universities are one step closer to a yearlong pause on H-1B visas
By Leona Masangkay | Jan. 29

Calendar

No events at this time.

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Ater her party's win, Corbett said she felt like she was in a dream. She'll continue to be a senator after winning Monday. She changed from District D to a more competitive District C seat — a district completely held by Gator senators in Fall 2021.

Change swept Districts C and D, while Gator Party held Districts A and B. Both parties picked up wins across residence halls.

After each result was announced, the winning party erupted in cheers for its candidate. As Change began to win seats back to back, Gator's energy levels teetered off.

"What was incredible was hearing Gator's silence more than ours," Corbett said. "I think it was a perfect description of their complacency in Senate. And seeing them disappointed with these results just shows that they're not ready for change."

Rae Riiska

Johnny Liu, District C senator candidate, hugs a fellow Gator Party member after a loss to Change Party at the Reitz Union Monday, Oct. 3, 2022.

For Senator-elect Mohammed Faisal (District D-Change), his win this Fall was a reclaiming of the Senate seat he lost in Fall 2021. Before results were announced, Faisal led Change in a chant as party members marched into the ground floor of the Reitz.

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“In my Fall freshman year, the minority party won 26 seats,” Faisal said. “I thought that's the best we'd ever get. I was lying to myself.”

A larger caucus will allow Change to pass more legislation previously voted down by the overwhelming majority, Change President Natalie McNamara said.

“It's been a long ride of people thinking that the minority party doesn't do anything,” McNamara said. “This is just the hardest working group of people I have ever met.”

On the second day of voting, 3,014 ballots were tallied, adding up to 9,858 votes total. Voter turnout was about 16.1% — a 2.5% increase from last Fall's 13.6% — according to Supervisor of Elections Ethan Halle and 2021 enrollment data.

Voting ran Sept. 27, as scheduled, and Oct. 3, a delayed date due to campus closure from Hurricane Ian's Florida landfall. Gator slated candidates for all 50 seats, and Change slated 45. Liberation slated eight candidates.

Senator-elect Jonathan Stephens (District D-Change), won his seat despite Gator issuing a statement ahead of the Fall election calling for him to be removed from Change's slate for raising his voice in the Senate. The party's majority victory will allow it to challenge Gator legislation more effectively in the future, he said.

“I think the word of the day is vindication,” Stephens said.

Elizabeth Hartzog, Gator campaign manager, said despite the results, the party's candidates should take solace in their effort and passion on the campaign. No changes in strategy are currently in the works, Hartzog said.

“It didn't turn out exactly like we wanted,” Hartzog said. “But look — we gave it our all. I'm so proud of each and every candidate that let their heart out there this week.”

Liberation candidates showed up to the Reitz Union donning Change shirts. The party has been vocal in its support for Change, and it endorsed several Change candidates prior to the election.

Aron Ali-McClory, Liberation president, said the moment was decades in the making. A Change win is a win for his party, too, he said.

“The one-party system is decaying as we speak,” he said. “And massive props to Change Party for nailing the beast.”

Despite the second day of SG voting shifting from Sept. 28 to Monday, students still showed up to the polls for a variety of reasons: to support friends running for office, to push for new SG legislation and to voice disillusionment with policy decisions.

Zoe Silver, an 18-year-old UF biomedical engineering freshman, said she voted because her sorority encouraged her to do so. But she thinks it's important for students to vote, she said.

"Change Party just seems more adamant about doing things that are best for students," Silver said.

Some students didn't vote straight down party lines. Nelson Calles, a 20-year-old UF English junior voted for the five of the seven Change candidates seats slated for District B, he said.

Calles cast his sixth vote towards Liberation, he said, and his last toward a write-in named after a UF meme account. He preferred to write in a fake candidate's name than to vote for any of the remaining Gator options.

"They're just manipulative," Calles said of Gator. "They really do make themselves look like the bad guys. What a lot of students want to do is to see that change of the turning of the tide."

Ian Dinkla, a 21-year-old UF political science senior, shared Calles' sentiment. He and Calles are members of UF Young Democratic Socialists of America, the group that sponsors Liberation.

Calles considered Liberation a "joke" in the past, he said, but he voted for them "just to be nice." Even so, he and Dinkla said they often disagree with Liberation's campaign because third parties have split the Change vote in the past, particularly in the Murphree area Fall 2021.

"They both want to make things better," Dinkla said. "But let's be real about which one could actually win the election though."

Sophia Abolfathi

Change Party District D senators Jonathan Stephens and Evan Asuncion celebrate their wins, Monday, Oct. 3, 2022.

Other voters like Chase Comprosky, a 21-year-old UF biochemistry senior, have been satisfied with Gator Party's Senate majority and executive administration. He voted for Gator because of his roommate Connor, he said, who's heavily involved in Florida Blue Key — a leadership group that organizes the annual homecoming festivities.

"Seeing my roommate and how passionate he is about the different things he's involved in led me to vote for his party," Comprosky said.

Aidan Newsom, an 18-year-old UF bioengineering freshman said he has friends in Gator, but he's choosing to vote for them because of its platform, too. Gator, he said, is more focused on the student experience.

Past SG action pushed some voters to contribute to Change's 27-seat victory.

Olivia Clift, a 19-year-old UF elementary education junior, said she voted for Change because she wanted to see Gator out of office.

She said Gator acts in the best interest of Greek life, which she isn't a part of, whereas Change wants what's best for all students. Specifically, she said doesn't like that Gator brought Donald Trump Jr. to campus in October 2019 and won't approve more blue lights for fraternity row.

The SG election commission will meet tomorrow at 6:30 p.m. in the Reitz Union to discuss campaign violations. Senate will later vote on the single seat that resulted in a tie — family housing. The seat only had two votes: one for Gator candidate Aubrey Mys and one for write-in candidate Sadia Sarwar.

Alissa Gary, Aidan Bush, Siena Duncan, Omar Ateyah, Kyle Bumpers, Lauren Brensel, Alexa Herrera and Brandon Hernandez contributed to this report.

Exhibit 9B: 2023 Independent Alligator article on the longstanding minority 'indie' party Change Party winning a majority in the Student Senate in Spring 2023 election

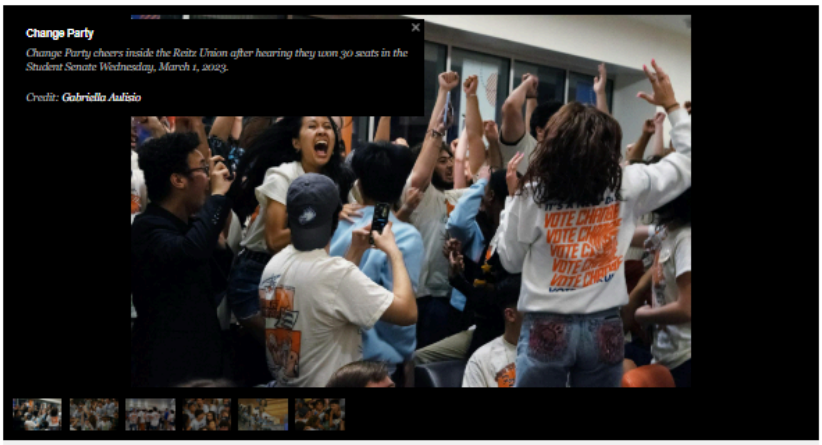
https://www.alligator.org/article/2023/03/student-government-spring-2023-elections?ct=content_open&cv=cbox_latest

NEWS | CAMPUS STUDENT GOVERNMENT

Gator wins executive seats, Change achieves first-ever UF Student Senate majority

Students cast more than 12,000 votes

By **Alligator Staff report**
March 2, 2023 | 1:18am EST


Change Party
Change Party cheers inside the Reitz Union after hearing they won 30 seats in the Student Senate Wednesday, March 1, 2023.
Credit: Gabriella Aulisio

Candidates, canvassers and campaign managers gathered at the ground floor of the Reitz Union, their excited chatter hushing as Supervisor of Elections Ethan Halle approached the second floor balcony Wednesday night.

Both Student Government parties could justify their exuberance as the Gator Party swept the executive ticket while the Change Party flipped the Student Senate in the largest turnout for an SG election since 2015.

Gator won the executive ticket with Olivia Green as president, Clara Calavia as vice president and Nyla Pierre as treasurer. In the Senate, Change won 30 seats, Gator won 19 and a non-party affiliated write-in candidate won a seat as well.

Change now holds 51 seats in Senate, therefore achieving a majority.

Awaiting for the election results, on the left side of the Reitz ground floor, Gator fiercely waved cardboard heads of its executive ticket in the air while chanting: "G-A-T-O-R, Gator Party — that's who we are."

On the right, Change responded to the cheers of its opponents with one of its own: "Forward together, Change t

n. 29

Popular

Parents upset after Alachua County Public Schools installs new fence near school
By Grace Larson | Jan. 25

Over 100 locals gather at emergency ICE protest in Gainesville
By Kaitlyn McCormack | Jan. 25

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By Maria Arruda and Kaitlyn McCormack | Jan. 30

Gainesville RTS cancels contract with disability van service, launches in-house app
By Maria Arruda | Jan. 28

Florida universities are one step closer to a yearlong pause on H-1B visas

While Faith Corbett, student body presidential candidate for Change and former minority party leader didn't win her election, she doesn't consider it a loss. She feels the executive candidates put up a good fight, she said.

Going forward, she said, with tears in her eyes, she's focused on the future of Change.

"I don't think the executive ticket is going to be ready for a Change majority," she said. "There are no bounds to Change."

Calavia is thrilled her party's hard work resulted in Gator taking the executive branch, she said. She hopes to prove to those who didn't not vote for Gator that her ticket is best suited for the job.

"You will not be disappointed," she said. "Olivia, Nyla and I are the most hardworking people you will find at UF. I hope to make everyone proud."

An amendment that proposed swapping "his/her" pronouns for "their" in the UF Constitution failed, with 7,246 voters who abstained or voted no.

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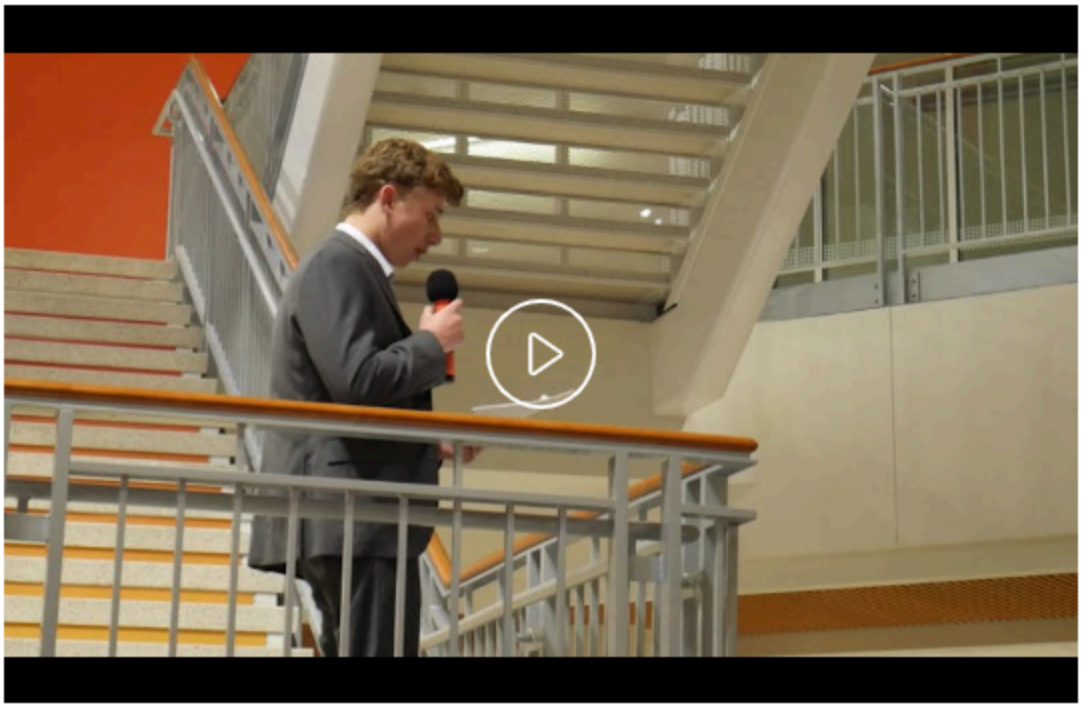
Voters turned in their ballots from all corners of campus — and for a variety of different reasons.



Paula Berio, a 22-year-old UF sociology junior, said her decision to vote for Change was more about its opponents. After reading a recently uploaded Reddit thread about Gator's unethical tactics for gaining votes, she said she became committed to voting for the other party.

The thread features a comprehensive list of allegations against Gator. Accusations included voter coercion through Greek life, mishandling of SG funds, failure to pass legislation in support of the LGBTQ community and sexual assault prevention and refusal to take accountability for wrongdoings.

"It's not like I knew a lot about Change, but I knew I didn't want [Gator Party]," she said. "It's like the lesser of two evils kind of thing."

Some voters cast their ballots while keeping in mind recent attacks on higher education — such as Gov. Ron DeSantis' audits of gender-affirming care and diversity, equity and inclusion efforts at Florida universities, as well the proposal of HB 999.

Amirah Elmahdi, a 21-year-old UF sociology junior, voted for Change because of its focus on inclusivity compared to Gator, she said.

Elmahdi, who is pursuing a minor in women's studies, said DeSantis' efforts to reverse DEI initiatives in Florida influenced her to vote for Change. Additionally, Student Body President Lauren Lemasters' vote to approve Ben Sasse as UF's new president made her concerned about giving Gator her vote.

"Everything DeSantis is trying to propose greatly impacts my major," Elmahdi said. "[Gator Party's] support of Ben Sasse definitely made me stray away from them."

Rory Ramirez, a 20-year-old UF sociology sophomore, recently changed his major from construction management to sociology. He fears eliminating DEI initiatives would take away certain topics of study in the sociology major, he said.

Ultimately, though, Ramirez voted to fulfill a requirement for his fraternity, Kappa Alpha Order.

"I voted Gator because I knew them as Greek affiliated — they supported Greek life," Ramirez said. "I voted because of that reason solely."

Cyril Bennett-King, a 21-year-old UF psychology junior, said his identity as a transgender student played a role in his decision to vote for Change.

"Having people that are going to have my back in Student Government...when we're in a scary time outside of UF, was a big part of my vote," he said.

Others were less informed on SG, voting either because of their Greek life membership or not at all.

Carly Johnecheck, a 19-year-old UF mechanical engineering freshman, said she doesn't know much about SG elections but voted for Gator to support her Sigma Kappa sorority sisters who are members of the party.

"[SG leaders] help the students be a part of the community and help other students," Johnecheck said. "I'd like to learn more about them as I get more involved in UF."

Nathan Lontz, a 21-year-old UF digital arts and sciences student, has never voted in an SG election. Wednesday was no different.

“This is honestly the first time I've heard about it,” Lontz said. “I'm quite the unknowledgeable participant here.”

The polling location at the UF Levin College of Law wasn't only a destination for law students, but also for undergraduates looking to avoid the crowds. Around 300 people voted at Levin Tuesday, and around 150 had voted by 4 p.m. Wednesday, a poll worker said.

Second-year law student Adreanne Martinez said she decided to vote for Change because she thinks it's more involved with writing resolutions.

Martinez, 25, wasn't part of SG while getting her UF undergraduate degree, but she was involved in drafting resolution 2020-1028, which requested UF assemble a group dedicated to researching and raising awareness of UF's connections to slavery. That showed her the importance of voting for people who would be active in representing her, she said.

“I tend to gear more towards the underdogs,” Martinez said.

Specific platform points, such as those relating to 24-hour services on campus, informed some students' votes.

Tristan Carrasquilla, an 18-year-old UF business administration freshman, voted for Gator after his friends told him to. He hopes Gator will find a way to open Southwest Recreation 24 hours a day — something Change promised in its platform. He almost didn't vote based on wait times, he said, but decided to between his classes.

“I just need to get into the habit of voting,” Carrasquilla said.

Carrasquilla consistently avoids speaking with Gator or Change representatives who are tabling in Turlington, but his girlfriend often makes him stop to speak with them, he said.

Grace Denault, a 19-year-old UF biomedical engineering sophomore, mostly voted for Gator. She served as a Gator senator for District C last Spring and Summer semesters and said the party is important to Greek life.

She supported 24-hour libraries and the failed amendment to replace “him/her” with “their” in bylaws to be more inclusive — two Change initiatives. Denault sees Gator being more involved than Change Party, she said.

“I've only seen Gator Party advertised,” she said. “That's the only reason I also think [Gator Party] would maybe do more, because they take the time to advertise.”

She has voted at every SG election since arriving at UF, she said.

“You have a say in what happens within your school, and you have a voice,” she said. “You kind of feel like you're making a change as well.”

But for others, the intricacies of SG still remain a mystery.

Lucy Parrucci, an 18-year-old UF freshman accounting freshman, wasn't sure if she would vote by the end of the election cycle because she was confused about what each party stood for.

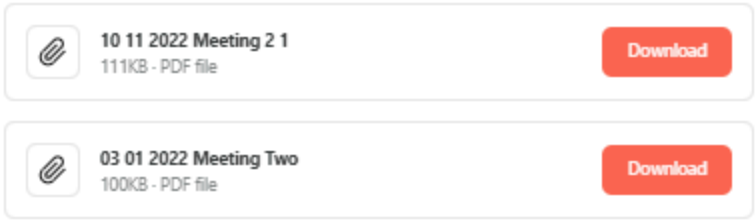
Exhibit 9C: Understand UFSG's coverage of the 'gridlock' of the Student Senate caused by the minority FBK-backed Gator Party against the indie majority party Change Party

https://understandufsg.substack.com/p/compiled-report-here-is-the-key-events

(3) Breaking News: Senate to not have double meeting, new Senate leadership to be elected after Spring Break *(originally published March 2023)*

Usually, **Senate after an election occurs in a double meeting.** In the first meeting, exiting Senators give goodbye speeches, and certain awards are voted on to commemorate Senators' work. In the second meeting, new Senators are sworn in, and a new Senate President, Senate President Pro-Tempore, and two Members-at-Large are voted in to fill the seats of the Replacement & Agenda Committee. **That will not be happening this Tuesday, March 7th after the outgoing Replacement & Agenda Committee, composed of a Gator majority and the Minority Party Leader, chose not to do the usual double meeting.**

This unusual move was sparked by a concern that the usual back-to-back double meeting format would require the Reitz to extend the building's hours. The previous two meetings, that of the last Spring and last Fall elections, ended at 10:58pm and 11:26pm, respectively. You can see the published meeting minutes at the files below:



The Reitz usually closes at 11pm. The move was also due to the fact that the meeting falls during midterms so some newly-elected Senators may not have been able to attend. **With this meeting split, the second meeting to elect Senate leadership will occur after Spring Break.** Tuesday's meeting this week will occur at 6:30pm to accommodate the numerous expected goodbye speeches.

— Looking through the meeting records available on the SG website, these are the closing times since Spring 2021:

Spring 2021 - 11:16pm

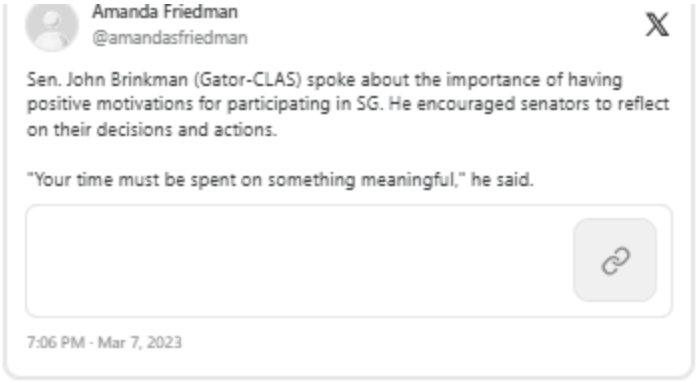
Fall 2021 - 10:33pm

Spring 2022 - 10:58pm

Fall 2022 - 11:26pm

(4) News: Senate validates election, Senate leadership to be elected after Spring Break *(originally published March 2023)*

In a meeting that went late into the night yesterday, Senators gave at times tearful and at times cautionary goodbye speeches [*editor's note: this was published on March 8th, so "yesterday" refers to March 7th*]. Outgoing Senators have the right to use unlimited time for goodbye speeches during public comment. **Senators who gave speeches included members of both parties. Notable speeches included those of John Brinkman, Grace Shoemaker, and Faith Corbett.** Per reporting from the Alligator's Amanda Friedman, corroborated by the livestream of Senate, Brinkman cautioned new Senators that "[their] time must be spent on something meaningful."


Amanda Friedman
@amandasfriedman
Sen. John Brinkman (Gator-CLAS) spoke about the importance of having positive motivations for participating in SG. He encouraged senators to reflect on their decisions and actions.
"Your time must be spent on something meaningful," he said.
7:06 PM · Mar 7, 2023

Grace Shoemaker and Faith Corbett both criticized Gator's actions across their time serving in Senate and during the Spring 2023 election season. Both, however, also congratulated all the newly-elected Senators. **Closing speeches were given by committee chairs whose positions will be vacated upon the beginning of the new Senate session after Spring Break** [editor's note: some committee chair positions remain unvacated due to the gridlock in Senate as of initial publishing].

The final major action was the validation of election results, a moment that led to applause and celebration by both parties in the Chamber. **At that meeting, all newly-elected Senators will be sworn in. Change has a slim majority, projected to be 49 Change Senators to 48 Gator Senators.** The first action taken by the Senate on March 21st, 2023 will be the election of a new Senate President, Senate President Pro-Tempore, and Member-at-Large 1 and 2. These people, along with the Majority Party Leader and Minority Party Leader, have the power to make suggestions on how to fill the three vacant seats in the Senate that will decide power going into the rest of the Semester.

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(5) Breaking News: Senate Replacement & Agenda Committee fails to meet quorum, Senate Secretary to make Senate schedule *(originally published March 2023)*

The Senate Replacement & Agenda Committee, whose purpose is to set the agenda for the week and interview candidates to fill vacant Senate positions, was unable to meet this morning. The committee requires four members present to meet quorum, though only three came: Interim Senate President Catherine Giordano (Gator-District A), Gator Party Leader Santiago Alvarez (Gator-District B), and Interim Member-at-Large Mara Vaknin (Gator-District A). The Change Party Leader Evan Rafanan (Change-District D) was not present, though Giordano noted he said he was going to come to the meeting.

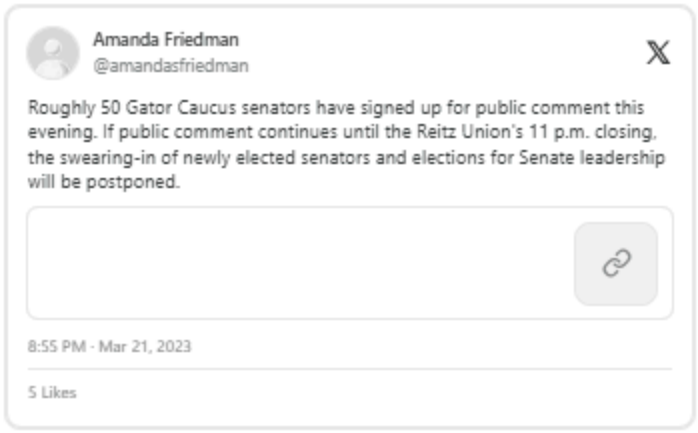
There were nine candidates who would have interviewed for any of the three open seats for off-campus housing. However, due to the lack of quorum, the meeting could not occur and the applicants had to be dismissed. With this preemptive cancellation, a schedule will need to be procedurally made by the Senate Secretaries and certain key acts, such as having elections for Senate leadership, will need to be procedurally added on the floor rather than automatically be part of the Senate agenda this Tuesday.

Giordano, who has served for about a year on the committee in the positions of Member-at-Large and now as Senate President Pro-Tempore, noted that this is the "first time [the committee] have not been able to reach quorum." In regards to

— Per the Alligator's Amanda Friedman, the motion to validate election results was made by Faith Corbett:

Amanda Friedman
@amandasfriedman
Corbett's motion to validate the Spring SG election results passed with unanimous consent, sparking applause across the chamber.
11:01 PM · Mar 7, 2023
3 Likes

— At the first meeting after Spring Break, about 50 Gator affiliates or Senators registered to give public comment. This effectively filibustered the Senate elections:


Amanda Friedman
@amandasfriedman
Roughly 50 Gator Caucus senators have signed up for public comment this evening. If public comment continues until the Reitz Union's 11 p.m. closing, the swearing-in of newly elected senators and elections for Senate leadership will be postponed.
8:55 PM · Mar 21, 2023
5 Likes

— Leadership of Gator Party claimed the move was not filibustering, per the Alligator's reporting on the Senate session.

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(6) Breaking News: Several Gator Senators form "Liberation" party caucus, specific reason unclear *(originally published March 2023)*

Amanda Friedman
@amandasfriedman
Eight formerly Gator-affiliated senators have disaffiliated from their party to form a Liberation Caucus, per the SG website. Change Caucus senators suspect this may be a strategy to help the Replacement and Agenda Committee finally meet quorum. Stay tuned for more information.
4:34 PM · Mar 30, 2023
1 Repost · 10 Likes

Several Gator-affiliated Senators who just yesterday [editor's note: this was published originally on March 30th, so "yesterday" is referring to March 29th] **were members of the Gator Party today appear to have formed a new political caucus, the Liberation Caucus. They include:**

- Sidney Ruedas (District A)

- Gretchen Howard (District B)
- Jimmy Hazlett (District B)
- Christine Locascio (District E)
- Patrick Murtha (Accounting)
- Emma Antonik (Nursing)

— Since our reporting on the seeming formation of a Liberation Caucus, the SG website seems to indicate the Gator senators dissolved the caucus and so it remains unclear what will happen. The website may have also just been reverted due to recent glitches, so the caucus may still exist.

---

(7) Breaking News: Replacement & Agenda Committee again fails to meet quorum *(originally published April 2023)*

Understand UFSG recently reported on the formation of a "Liberation" Caucus, created by 8 Gator-affiliated Senators. Per the Alligator's Amanda Friedman, speculation in Change was that **the move was a way for Gator Caucus to re-secure the Replacement & Agenda Committee. That came after Change Caucus Leader Evan Rafanan told the committee he had no intention to show up to the committee until leadership elections occurred in the Senate.** With his absence last week, the meeting could not meet the minimum attendance and did not occur. The committee, as the name implies, suggests replacements for vacant seats and sets the Senate agenda for the week.

Today, we learned that 13 Change-affiliated Senators had temporarily joined the Liberation caucus, seemingly in a move to dilute the 8 former Gator Senators' choice of leader. That individual was revealed today to be Sen. Jimmy Hazlett of District B. **Under the Rules & Procedures of the Senate, it states: "the party member who receives the signatures of a majority of the party will be the party leader."**

Rafanan was physically present at R&A today, along with the temporary Change affiliates-turned-Liberation leader and assistant leader, Senators Jonathan Stephens of District D and Andrew Taramykin of CLAS, respectively. We learned from Taramykin the number of Change affiliates that temporarily flipped in a request for comment. **However, when roll call began, the Change and new Liberation leadership walked out, in an apparent quorum bust. As such, the meeting again did not meet the minimum attendance and could not occur.**

In an email from Taramykin, he revealed that the 13 Senators re-affiliated to Change shortly after the committee meeting closed. Of the move, Taramykin said, "Our sole purpose in doing [this] was to **prevent a fake third party from giving the minority [Gator] party an artificial advantage and an unfair quorum on R&A,** which they would have used to undermine the results of the last two general elections." **He was careful to clarify later in the email that his sentiments do not reflect the opinions of Change Caucus or the Liberation Caucus at large.** In a response to the same request for comment, Stephens said that they, as a member of YDSA UF, "could not stand by and witness such theft, mischaracterization, and imitation by the Gator Caucus" in reference to the sudden creation of the Liberation by multiple Gator affiliates. YDSA formed the Liberation Party that in ran in the Fall 2022 election. No Liberation Party members won a seat in that election. As such, until a couple days ago, no Liberation

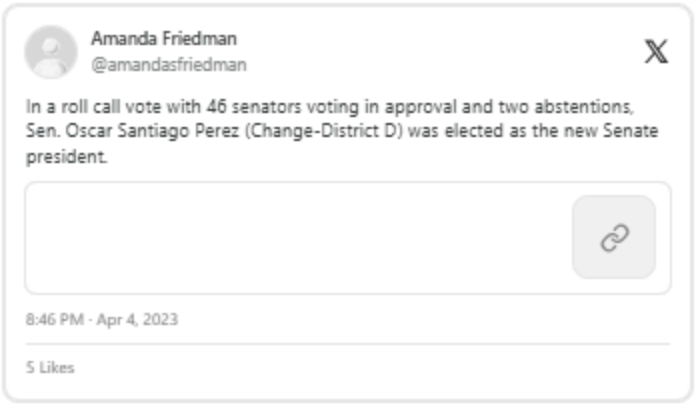
reached three weeks with the committee not meeting as general dysfunction occurs in the Senate at large.

We have also reached out to Hazlett for comment and will share what he says as soon as possible. With what happened today, the upcoming regular meeting on Tuesday and special meeting on Thursday of the Student Senate will likely be tense. Both meetings will be open to the public. The Tuesday meeting will occur in the Senate Chamber in the Reitz Union, on the ground floor of the building. It will occur at 7:30pm. The agenda will be the same basic template form drafted by the Senate Secretaries that has been used the last two weeks, due to R&A not being able to construct an agenda today.

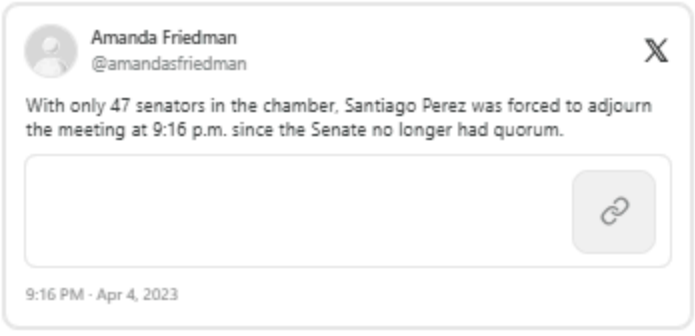
— As of writing, we have yet to receive comment or clarification from Sen. Hazlett about the temporary formation of the Liberation Caucus, which seems to have been dissolved.

— Per the Alligator's Amanda Friedman and corroborated by on the ground witnesses, a new Senate President was elected, though the legitimacy of the election was challenged by Interim Senate President Catherine Giordano. Before the vote happened, almost all of the Gator Caucus left. Those who remained included: Interim Senate President Catherine Giordano (Gator-District A), Senator Wilson Roberts (Gator-District B), and Senator Aubrey Mys (Gator-Graduate & Family Housing)

— In a vote of 46 for Oscar Santiago Perez to two abstention votes, Oscar Santiago Perez was chosen Senate President.


Amanda Friedman
@amandasfriedman
In a roll call vote with 46 senators voting in approval and two abstentions, Sen. Oscar Santiago Perez (Change-District D) was elected as the new Senate president.
8:46 PM · Apr 4, 2023
5 Likes

— Immediately after the election, a quorum call established only 47 Senators present and the meeting ended.


Amanda Friedman
@amandasfriedman
With only 47 senators in the chamber, Santiago Perez was forced to adjourn the meeting at 9:16 p.m. since the Senate no longer had quorum.
9:16 PM · Apr 4, 2023

— In a court case heard on April 10th, 2023 over the election. They declared the results invalid and paused all Senate activity until both parties came to a compromise, per Alligator reporting.

— The results of the agreement was a power sharing agreement, an unprecedented move during Gator's time previously as the majority party. The terms can be found below:

STUDENT SENATE OF THE UNIVERSITY OF FLORIDA
"Injunction Adjournment Terms and Agreements (IATA)"

WHEREAS, The University of Florida Supreme Court Ordered the University of Florida Student Senate to meet before Friday, April 14, 2023.

WHEREAS, The University of Florida Supreme Court placed a temporary injunction on the Student Senate that prohibited the Student Senate from holding committee meetings and meetings—regular, special, or virtual—until further order of the court.

THEREFORE, LET IT BE RESOLVED that the leadership of both parties have come to an agreement in a manner that provides appropriate representation of the student body;

THEREFORE, LET IT FURTHER BE RESOLVED THAT the leadership of both parties agree to the following:

1. Senate leadership elections will occur on April 18, 2023, with no delay; and,
2. Oscar Santiago Perez will be elected with the support of both caucuses to be the Senate President of the University of Florida Student Senate; and,
3. Nathan McGinnis will be elected with the support of both caucuses to be the Senate President Pro-Tempore of the University of Florida Student Senate; and,
4. Two Members-at-Large will be elected from the Gator Caucus with the support of both caucuses.

THEREFORE, LET IT FURTHER BE RESOLVED THAT the following statements with Committees will be agreed to:

1. Judiciary Committee: The Chair will be the most qualified Change Caucus Member; and,
2. Budget & Appropriations Committee: The Chair will be the most qualified Gator Caucus Member; and,
3. Rules & Ethics Committee: The Chair will be the most qualified Gator Caucus Member; and,
4. Information and Communication Committee: The Chair will be the most Gator Caucus Member; and,
5. Three Budget and Appropriations Committee Seats will be approved on April 18, 2023: two seats will be given to the most qualified members of the Gator Caucus, and one seat will be given to the most qualified member of the Change Caucus.
6. The Budget and Appropriations Committee, by the third Replacement & Agenda Committee meeting of Summer 2023, will have four members from the Change Caucus and four members from the Gator Caucus.
7. Rule XVII of the Rules & Procedures will be addressed before the end of Summer B semester.

IN CONCLUSION, LET IT FINALLY BE RESOLVED THAT Change Caucus Leader Evan Rafanan and Gator Caucus Leader Santiago Alvarez will sign to abide by the terms listed above.

Change Party Leader
13 April 2023

Gator Party Leader
13 April 2023

Supreme Court Reporter Volume 4 Update April2023
497KB · PDF file
Download

Exhibit 9D: Supreme Court puts an injunction on the Student Senate until a compromise between Change Party and Gator Party is met after voiding the election of the Senate President due to lack of quorum

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided April 10, 2023

In re: Senate Leadership Elections on April 4, 2023

WIELE, C.J. delivers the opinion of the Court.

On the heels of what is surely one of the darkest moments in University of Florida Student Government history, John Brinkman ("Petitioner Brinkman") and Shelby Shultz ("Petitioner Schultz") (collectively, the "Petitioners") submitted this petition requesting that the Court intervene and restore order to the UF Student Senate. Specifically, what is requested is that (i) the Court order the Senate to disregard the Senate leadership election on April 4, (ii) order members of the Replacement and Agenda Committee ("R&A") to meet and hold interviews for vacant seats, (iii) challenge the Legislative Branch to live up to its representative capacity and move past gridlock and (iv) issue a temporary injunction pending the outcome of the case. Senator Oscar Santiago-Perez ("Counter-Petitioner") filed a timely opposition brief that complied with the temporary measures adopted by the Court for the purposes of this case. Counter-Petitioner first requests that the Court dismiss the Petitioner's brief for lack of standing. In the alternative, Counter-Petitioner requests that should the Court find standing that it (i) dismiss the petitioners' first request for relief, and find the Senate President election as being legal and constitutional, (ii) dismiss the petitioners second request for relief, as it is based on a faulty interpretation of *In Re: "Merwitzer - Representation in Validation Results"* 3 S.C. 57, 57 (February 16, 2021) and (iii) dismiss the petitioner's third request for relief, as this Court is unable to fulfill the premise of the relief.

I. Jurisdiction

Article V, Section 3(b)(2) of the University of Florida Student Body Constitution ("Constitution") states that "[t]he Supreme Court shall, upon written petition of any member of the Student Body and for good cause shown, order any [SG] official or any officer of a student organization that receives Student Body funds to perform any lawful act or refrain or desist from an unlawful act." An individual requesting an order under this provision of the constitution must have (1) a concrete injury, (2) traceable to the petitioner, and (3) redressable by the Court. *In re: "Ortiz Standing,"* 3 S.C. 52, 52 (September 11, 2020).

In the present case, Petitioner Brinkman failed to allege standing for himself. All of Petitioner Brinkman's alleged injuries, both stated in the petition and articulated during the hearing, were not particularized enough to satisfy this Court's standing requirement. This is because all of Petitioner Brinkman's injuries, whether it be the failure to address grievances or the lack of fund appropriation were no more traceable to Petitioner Brinkman than any other University of Florida student. The requirement that an injury be particularized to a petitioner is necessary because the absence of such a requirement would undercut the Court's own requirement that an injury be traceable to the petitioner. Petitioner Shultz (herein, the "Petitioner"), on the other hand, meets this Court's standing requirement under Article V, Section 3(b)(2). Petitioner has a particularized injury because they have applied for a vacant Senate seat to be filled by R&A. Since the entire

Senate Chamber has failed to elect a Senate President Pro Tempore,[1] it takes but one absence from the committee to lack quorum. As a result of intentional or unintentional efforts to bust quorum, R&A has not allowed the Petitioner an opportunity to interview for a vacant Senate seat.

II. Background

The timeline below summarizes the factual events of the April 4 brouhaha masquerading as a meeting of the Senate.[2]

- 44:44: Change Party Senator moves to open the floor for nominations for Senate President.
- 44:55: Gator Party Senator moves to suggest the absence of a quorum.
- 45:08: Senator Giordano recognizes the motion to suggest the absence of a quorum and begins to call for Senators to begin roll call process.
- 45:09: Change Party Senator(s) object and explain that there was already a motion on the floor that the Senate must consider before.
- 45:35: Senator Giordano asks Senators to begin roll call process.
- 45:56: Motion to open the floor for nominations passes by unanimous consent.
- 46:00: Senator Santiago Perez was nominated for Senate President.
- 46:50: After a series of confusing motions, Senator Giordano moved for a 5-minute recess to sort out the procedural mess, which fails immediately.
- 47:10: Gator Party Senator moves to suggest the absence of a quorum.
- 47:13: Change Party Senator(s) raise a point of order that a motion to suggest the absence of a quorum cannot be considered due to the fact that a previous motion to elect Senator Santiago Perez was made and that the Senate has to dispose of the first motion prior to considering the second motion.
- 48:08: Motion to call previous question (on election of Senator Santiago Perez) by unanimous consent passes.
- 50:58: Change Party Senator moves (pursuant to Robert's Rules) to vacate the Chair.
- 51:21: Senator Giordano fails to recognize the motion as valid.
- 51:55: Change Party Senator asks 3 times if the point of order was received
- 52:10: Change Party Senator declares that because Senator Giordano failed to recognize a point of order 3 times, Robert's Rules allows the Senate to vote to vacate the Chair without recognition or approval by the Chair.
- 52:58: Motion passes (46 yes, 3 no) to vacate Chair.
- 53:00: Senator Giordano raises the issue that there is no quorum.
- 53:03: Change Party Senator moves to appeal decision of Chair that there is no quorum.
- 53:15: Senator Giordano again states that there are 49 present Senators, there is no quorum, and the meeting is adjourned.
- 53:40: Change Party Senator declares that Senator Giordano is no longer the Chair and requests that she step down.

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[1] I include this footnote only to highlight the absurdity that the Senate Chamber as of the writing of this petition continues to lack, or even vote on, a Senate President Pro Tempore. Rule I, 1(a) of the Senate's Rules and Procedures dictates that the position should be elected "at the first meeting of the Senate following the validation of Senate elections." The chamber has failed to accomplish this with three weeks left in the semester.

[2] Timeline is based on the footage from the following link, https://www.facebook.com/UFStudentSenate/videos/1169805710377065. I would also like to credit Justice Allen for his assistance in preparing this timeline.

- 54:35: Senator Faisal declares that he is Chair of the Senate.
- 54:48: Senator Giordano moves to suggest the absence of a quorum.
- 54:50: Senator Faisal declares that Senator Giordano is not recognized and provides that pursuant to Robert's Rules, if there is a vote being conducted, you may not call for a quorum.
- 55:08: Gator Party Senator moves to suggest the absence of a quorum.
- 55:15: Senator Faisal again declares that because the floor is not open (i.e., there is a motion to vote for Senate President on the table), the Senate cannot consider the motion.
- 56:18: Roll call vote begins for Senate President. The official meeting minutes reflect a roll call vote with 48 senators present.

III. Analysis

a. *R&A Request for Relief*

This Court does not have the authority to order R&A to meet. As the Counter-Petitioner correctly asserts, Article III, section 6(b) expressly gives the Senate the power to compel attendance of absent members. The Court's *In re: "Merwitzer-Representation in Validation Results"* 3 S.C. 57, 57 (February 16, 2021) is not analogous to the case at hand because the *Merwitzer* decision did not involve a power expressly delegated to the Senate. While the Court is sympathetic to the Petitioner and their inability to be interviewed, no fundamental right is threated that would justify the Court requiring R&A to meet.

b. *April 4 Senate Leadership Election*

This Court orders the Senate to disregard the April 4 leadership election because of a lack of quorum and further orders the Senate to hold an election for its leadership where quorum can be conclusively established. According to the Rules and Procedures of the Senate, "[a]ny Senator may raise a point of order regarding the presence of a quorum, at which point the Chair of the Senate will instruct the Chair of the Rules and Ethics Committee (or Vice Chair or their designee) to call the roll." SENATE RULES AND PROCEDURES, Rule IV, Section 3(b).The Constitution of the Student Body defines quorum as "a majority of the total membership of the Student Senate . . . ." STUDENT BODY CONSTITUTION, Article III, Section 8(a). Furthermore, the Constitution says that this quorum is "necessary to conduct business." *See id.* According to the Senate's own rules and procedures, at the 44:55 mark of the recording the meeting should have been stopped by then Chair Giordano to assess quorum after the suggestion of its absence was made by a Gator Party senator. Following this—the absence of quorum is mentioned no less than five more times before the vote for Senate President is held. Why a quorum call was not held until after the vote for Senate President was conducted cannot be known. Nonetheless, this disregard of rules, whether intentional or not, cannot excuse the lack of quorum. Counter-Petitioner argues that according to Roberts Rules of Order, a roll call vote cannot be used to assess whether quorum is present in the Senate chamber. Whether this is a correct assessment of Robert's Rules is irrelevant, however, given that the Constitution deems it "necessary" for a quorum, composed of 51 student Senators, to be present to conduct business. At the first indication that the chamber may lack the requisite number of Senators, additional business cannot be

conducted until the presence of quorum can be conclusively demonstrated. On April 4, while a mere eye test would have suggested the absence of quorum, the roll call vote definitively proved its absence. Because the lack of quorum had been definitively proven, Senate should have adjourned as it was no longer able to conduct business. When a quorum call is made and ignored and the absence of quorum can be inferred or determined from external evidence (such as a roll call vote), Senate shall be deemed to lack quorum to prevent circumvention of the Constitutional requirement that the Senate have quorum to conduct business. Such a holding is necessary to ensure that the requirements of the Constitution are upheld.

c. *Challenge to the Legislative Branch*

While this Court is unable to adequately provide redress to the Petitioner's third request for relief, it is the Court's sincerest hope that its actions today cause members on both sides of the aisle to take a long look in the mirror and reflect on what their goals are when they show up to Tuesday night meetings of the Senate in the Reitz Union. As stated during the Court's deliberations, when the legislature chose to act like children for the entirety of a semester, the Senate forced the Court's hand to issue a remedy treating it as such.[3]

d. *Temporary Injunction*[4]

This Court enjoins future meetings of the Senate or its committees until lifted by the Court pursuant to the terms contained on the temporary injunction issued to the leaders of the majority and minority parties.[5] The Constitution vests all judicial power in the Supreme Court and inherent in these powers is the ability to issue injunctions when necessary. STUDENT BODY CONSTITUTION, Article V, section 1. The Constitution also provides for the separation of powers among the branches of the student government. STUDENT BODY CONSTITUTION, Article II, section 4(A). The Constitution grants the Senate the authority to determine the time and place of its meetings. STUDENT BODY CONSTITUTION, Article III, section 6(d). However, the Rules and Procedures of the Senate set the procedure for doing so by authorizing R&A to set the time and place or regular meetings at the beginning of the academic term. SENATE RULES AND PROCEDURES, Rule III, Section 1(b). In the Court's October 10, 2011 decision, *Unnamed decision*, Supreme Court Reporter vol. 1, p. 85., a temporary injunction was issued that temporarily enjoined the Senate from validating the election results—a power solely delegated to the Senate by the Constitution. STUDENT BODY CONSTITUTION, Article III, section 6(e). That Court felt compelled to protect the liberties of the study body and the authority to take this action serving "as arbiter[] of the [Constitution]." *Unnamed decision*, Supreme Court Reporter vol. 1, p. 85. Additionally, the Court did not find that issuing an injunctive order infringed upon the ability of the Senate to validate election results. *See id.* at 86. Under Article I, Section 2 of the

[3] Because the Senate showed a continued inability to conduct its business without outside intervention, this Court felt compelled to place the Legislature in a constructive "time out" to restore order and uphold its own duties as the last line of redress for students unable to get help from their democratically elected representatives.
[4] Prior to the issuance of this opinion, the Court lifted the injunction because the leaders of the Majority and Minority parties complied with the Court's order (contained in Attachment A). The order lifting the injunction can be found in Attachment B.
[5] *See* Attachment A.

Constitution, every student is guaranteed certain basic rights. Inherent in these is every student's right to have a properly functioning Legislature capable of conducting ordinary business (or any business for that matter) and carrying out the will of the student body as elected representatives. While not expressly enumerated, such a right is foundational to the Article I, Section 2 basic rights. After an entire semester of the Senate failing to provide the student body with this fundamental right, the Court finds it has no choice but to enjoin future meetings of the Senate or its committees until a compromise can be reached. The Court's goal is to reset the contentious political environment in the Senate and direct the Legislature's focus to what really matters—the students. Beyond being necessary to uphold the most fundamental of student rights, the ability to enjoin the Senate when there is a risk of great uncertainty is not without precedent. While the October 10, 2011 Court was concerned with the validity of the election results, the Justices nonetheless demonstrated an ability to exercise broad injunctive powers when necessary to prevent uncertainty that could shake the foundation of the entire student government system. Likewise, in the case before the Court, enjoining future meetings of the Senate and its committees is necessary to prevent a situation where two individuals show up to the Senate chamber claiming to be the President of the Senate. The potential collateral of such a situation is simply too great for this Court to ignore.

The Court's ability to enjoin the Senate from future meetings is no doubt a drastic step. In no way should this opinion be taken as an endorsement that the Court may regularly exercise such broad discretion. As an initial matter, it is important to recognize the context in which this exercise of power arises. The University's student government is based on the federal and state governments; however these systems are not exact replicas. Were the Supreme Court of Florida to use such a show of force, this Court would agree that such an act would be impermissible. In contrast, at the University of Florida our primary focus is our education. Thus, the incentives to act and the consequences of inaction are not the same because Senators and students can carry on a majority of their lives in the face of inaction without any sort of real consequences. Secondly, this exercise of power should be limited to the facts of this case—an instance where the Legislature has demonstrated a continued inability to conduct its regular business for the entirety of a semester and the failure of the Court to intervene would threaten to undermine the legitimacy of the entire student government ecosystem. To the extent that the Supreme Court is infringing upon the Legislature, it is important to remember that this is a temporary rather than a permanent measure. In exercising this power, the Court limited its own exercise of power by setting a clear procedure that would lift the injunction without discretion of the Judiciary (and the injunction was lifted when these procedures were met). It is the Court's duty to serve as the final arbiter of the Student Body Constitution. Furthermore—the Court is the last line of redress for students seeking relief from the actions (or the lack thereof) of their elected representatives. As such, it is the responsibility of this Court to hit the reset button on the disaster currently unfolding in the Senate chamber. In the face of total apathy towards the student body by their democratically elected representatives, this Court must serve as the catalyst of change by enjoining future meetings of the Senate and its committees until leadership of both the Change and Gator parties are able to agree on a tenable path forward

to elect leadership, allocate the budget and otherwise conduct their regularly scheduled business.[6]

IV. Conclusion

THEREFORE this Court (i) DISMISSES Petitioner Brinkman from the petition, (ii) DENIES ordering the Replacement and Agenda committee to meet, (iii) FINDS that the election of the Senate President on April 4 lacked quorum and ORDERS the Senate to hold elections for its leadership where the presence of quorum can be conclusively established, (iv) ASKS that the members of the Senate reflect on what their role is as a student representative and (v) ENJOINS all future meetings of the Senate or its committees until further notice.

It is so ordered.

NEERANJAN, J., ALLEN, J., RUNYAN, J., and VAN DE BOGART, J. concurring.

[6] *See* Attachment C for the proposal submitted to the Court.

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided April 10, 2023

In re: Senate Leadership Elections

WIELE, C.J. delivers the order.

PRELIMINARY INJUNCTIVE ORDER

THIS ACTION came before the Court on a petition for a temporary injunction. The Court has found cause to enter an injunction.

PROHIBITED ACTIVITIES

IT IS HEREBY ORDERED that the University of Florida Student Government Senate shall be enjoined from holding a meeting—regular, special, or virtual—of the UF Student Government Senate, or any of its committees, until further order of the Court.

MEDIATION ORDER

IT IS FURTHER ORDERED that the leadership of the Change Caucus and the Gator Caucus of the UF Student Government Senate shall meet by **Friday, April 14th, 2023 at 5:00 pm** to come to an agreement by which the Senate shall move beyond the present gridlock in a manner that provides appropriate representation of the student body. Once the Agreement is finalized and signed by the leadership of both parties, it shall be sent via electronic mail to the Chief Justice of the University of Florida Supreme Court and the four Associate Justices at which point the Supreme Court will lift this Temporary Injunctive Order.

RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

IT IS SO ORDERED.

NEERANJAN, J., ALLEN, J., RUNYAN, J., and VAN DE BOGART, J. concur.

Exhibit 9E: Supreme Court lifts the injunction after Change Party and Gator Party agree to a compromise to split control of Senate committees. Notably, the 'most qualified senator' of the FBK-backed Gator Party is agreed to hold the Budget & Appropriations Chair.

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided April 10, 2023

In re: Senate Leadership Elections on April 4, 2023

Thursday, April 13, 2023, 1:30 PM

This action came before the Court on a request that the Court (i) declare the election results of the April 4, 2023 leadership election as invalid, (ii) order the members of the Replacement and Agenda committee to meet and hold interviews for vacant seats, (iii) challenge the legislature to live up to its representative capacity and (iv) issue a temporary injunction enjoining future meetings of the Senate pending the outcome of the case. This Court issued a temporary injunction enjoining future meetings of the Senate or its committees until the leadership of both parties were able to come together and present the Court with a signed agreement manifesting a path towards the Senate resuming its ordinary duties. On Thursday, April 13, 2023 at 11:00 AM Majority Party Leader Evan Rafanan emailed such a plan to the Court (Attachment A). This Court is very impressed with timeliness of the Parities' resolution and their outline detailing the allocation of Senate leadership positions and committee spots. As such, the Court hereby withdraws its injunctive order. The Court will retain jurisdiction until an opinion can be issued on this matter.

It is so ordered.

WIELE, C.J., NEERANJAN, J., ALLEN, J., RUNYAN, J., VAN DE BOGART, J., concur.

Attachment A

STUDENT SENATE OF THE UNIVERSITY OF FLORIDA
"Injunction Adjournment Terms and Agreements (IATA)"

WHEREAS, The University of Florida Supreme Court Ordered the University of Florida Student Senate to meet before Friday, April 14, 2023.

WHEREAS, The University of Florida Supreme Court placed a temporary injunction on the Student Senate that prohibited the Student Senate from holding committee meetings and meetings—regular, special, or virtual—until further order of the court.

THEREFORE, LET IT BE RESOLVED that the leadership of both parties have come to an agreement in a manner that provides appropriate representation of the student body;

THEREFORE, LET IT FURTHER BE RESOLVED THAT the leadership of both parties agree to the following:

1. Senate leadership elections will occur on April 18, 2023, with no delay; and,
2. Oscar Santiago Perez will be elected with the support of both caucuses to be the Senate President of the University of Florida Student Senate; and,
3. Nathan McGinnis will be elected with the support of both caucuses to be the Senate President Pro-Tempore of the University of Florida Student Senate; and,
4. Two Members-at-Large will be elected from the Gator Caucus with the support of both caucuses.

THEREFORE, LET IT FURTHER BE RESOLVED THAT the following statements with Committees will be agreed to:

1. Judiciary Committee: The Chair will be the most qualified Change Caucus Member; and,
2. Budget & Appropriations Committee: The Chair will be the most qualified Gator Caucus Member; and,
3. Rules & Ethics Committee: The Chair will be the most qualified Gator Caucus Member; and,
4. Information and Communication Committee: The Chair will be the most Gator Caucus Member; and,
5. Three Budget and Appropriations Committee Seats will be approved on April 18, 2023: two seats will be given to the most qualified members of the Gator Caucus, and one seat will be given to the most qualified member of the Change Caucus.
6. The Budget and Appropriations Committee, by the third Replacement & Agenda Committee meeting of Summer 2023, will have four members from the Change Caucus and four members from the Gator Caucus.
7. Rule XVII of the Rules & Procedures will be addressed before the end of Summer B semester.

IN CONCLUSION, LET IT FINALLY BE RESOLVED THAT Change Caucus Leader Evan Rafanan and Gator Caucus Leader Santiago Alvarez will sign to abide by the terms listed above.

Evan Rafanan
Change Party Leader
13 April 2023

Santiago Alvarez
Gator Party Leader
13 April 2023

Exhibit 9F: Supreme Court overturns multi-district model in April 2023 in case '*Students for Fair Representation v. Halle*'

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided on April 23, 2023

Students for Fair Representation v. Halle

RUNYAN, J. delivers the opinion of the Court.

Twenty members of the student body ("Petitioners") request this Court to first interpret Article I, Section 2(a), and Article III, Sections 2(a) and 3 of the UF Constitution in determining the constitutionality of Student Senate Bill 2022-1035 (apportioning Student Senate seats for each off-campus district for the Fall 2023 election). Accordingly, the Court finds Student Senate Bill 2022-1035 unconstitutional. Second, Petitioner requests this Court to order the Student Senate to adopt Petitioner's proposed remedial apportionment of seats for the Fall 2023 Student Senate election. The Court denies this request.

I. Jurisdiction

As to Petitioners' first request, jurisdiction is granted under Article V § 3(b)(1)(a) of the UF Constitution, which states that "[t]he Supreme Court shall interpret any provision of the constitution or law upon written petition of twenty members of the Student Body." As to Petitioners' second request, jurisdiction is granted under Article V Section 3(b)(2) of the UF Constitution ("Constitution"), providing that "[t]he Supreme Court shall, upon written petition of any member of the Student Body and for good cause shown, order any Student Government official or any officer of a student organization that receives Student Body funds to perform any lawful act or refrain or desist from an unlawful act."

II. Discussion

Petitioners argue the unconstitutionality of the apportionment of off-campus seats in Student Senate Bill 2022-1035 because the seats are disproportionate to the student body population in each district, as allegedly demonstrated by "Student Population Data" from the Office of the University Registrar (Exh. A). The current apportionment, Petitioners argue, violates Article III, Section 2(a) of the UF Constitution (" . . . the Student Senate shall apportion seats on the basis of population as nearly equal as practicable . . . .") and the "one person, one vote" principle established under federal law. Petitioners argue that such injury to voters may be remedied by Petitioners' proposed apportionment of seats and requests the Court to order the Senate to adopt the proposed remedy.

Jonathan C. Stevens ("Counterpetitioner") argues Petitioners' request is not yet ripe for judicial review. We disagree as to Petitioners' justiciability argument, given that the Student Senate Bill 2022-1035 passed in Senate and took effect as law, establishing apportionment for the upcoming election and providing a basis for which the Court may exercise its jurisdiction.

In the alternative, Counterpetitioner argues that the matter of reapportionment is better left to the Senate. To some extent, the Court agrees, as discussed below. Counterpetitioner requests this Court to order the Senate "to review apportionment under the 5 Criteria expected of all legislation that is reviewed by the Senate Judiciary Committee." We decline to do so. Further,

Counterpetitioner argues that it is unconstitutional for the Court to order the Student Senate to adopt remedial apportionment of off-campus districts by presenting an unauthenticated Excel spreadsheet allegedly derivative of a public information request for "the data used for the Student Senate Reapportionment Act of 2023." Such Excel spreadsheet serves as Counterpetitioner' grounds for the argument that Petitioners' proposed remedial apportionment does not accurately represent an equal population distribution among off-campus students. The Court need not address this argument given its resolution below.

The Court agrees with Petitioners as to the unconstitutionality of the apportionment of off-campus seats provided by Student Senate Bill 2022-1035. As both Petitioner and Counterpetition agree, it is obvious that the current apportionment of off-campus seats fails to accurately represent the proportion of Students residing in District A, thereby violating Article III, Section 2(a) of the UF Constitution (" . . . the Student Senate shall apportion seats on the basis of population as nearly equal as practicable . . . ."). As such, Student Senate Bill 2022-1035 is deemed unconstitutional and shall not be effectuated for the Fall 2023 Student Senate election.

The Court declines, however, to order the adoption of Petitioners' proposed remedial apportionment of off-campus seats. The unauthenticated data provided by both Petitioner and Counterpetitioner as to the population of students in each off-campus district gives the Court pause in drawing any conclusions as the constitutionality of Petitioners' proposed remedial apportionment. Regardless, the Court is not a legislative body, and as such, need not step into the shoes of the legislator to craft a constitutional, remedial apportionment of off-campus seats. The interest of the Student Body is better protected by its elected Senators, who are obligated under the Article III, Section 3 of the UF Constitution to ". . . determine the number of senators per class within the constitutional limits . . . ." As such, this Court order the Student Senate to "apportion seats on the basis of population as nearly equal as practicable . . . ." for the upcoming Fall 2023 election, in compliance with Article III, Section 2(a) of the UF Constitution.

III. Conclusion

THEREFORE, this Court deems Student Senate Bill 2022-1035 unconstitutional. The Court **DENIES** Petitioners' requested relief and **ORDERS** the Student Senate to apportion seats in compliance with Article III, Section 2(a) of the UF Constitution, as soon as reasonably practicable before the Fall 2023 Election.

It is so ordered.

WIELE, C.J., NEERANJAN, J., ALLEN, J., VAN DE BOGART, J., concur.

Exhibit 9G: 2023 Independent Alligator article on apportionment bills by Change and Gator failing in the Student Senate, disputes over validity of a Change-sponsored amendment to annual budget legislation

NEWS | CAMPUS STUDENT GOVERNMENT

Senate holds second Big Five budget reading, plans to reconsider Senator removal

The Fall 2023 apportionment was presented on Senate floor

By Vivienne Serret

July 27, 2023 | 8:36pm EDT

SG generic Photo by Kate McNamara | The Independent Florida Alligator

Members from the Gator Party and the Change Party addressed the July 18 Big Five budget reading and the recent Rules and Ethics Committee removal of a Student Government Senator at the July 25 SG Senate meeting.

The July 18 budget reading was the first of the two Senate budget readings. The July 25 meeting opened the floor to further consider the amendments which were passed or failed at the previous meeting.

Senate President Oscar Santiago Perez (Change-District D) called the July 25 meeting to order at 7:15 p.m. — with 60 senators present — and adjourned at 11 p.m. due to the Southwest Recreation Center closing.

Student Body Treasurer Nyla Pierre expressed several concerns during public comment about how Amendment 1 to the budget was passed.

A standing vote has always been counted, and she believes Santiago Perez ignored motions made by Gator-affiliated Senators, Pierre said.

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Parents upset after Alachua County Public Schools installs new fence near school

By Grace Larson | Jan. 25

Over 100 locals gather at emergency ICE protest in Gainesville

By Kaitlyn McCormack | Jan. 25

What did the state say about Gainesville and Alachua County in its DOGE audit?

By Maria Arruda and Kaitlyn McCormack | Jan. 30

Gainesville RTS cancels contract with disability van service, launches in-house app

By Maria Arruda | Jan. 28

Florida universities are one step closer to a yearlong pause on H-1B visas

By Leona Masangkay | Jan. 29

Calendar

No events at this time

"Let's prioritize the truth," Pierre said. "Put procedures before party lines."

Amendment 1 to the budget, authored by Sen. Raj Mia (Change-CALS), sought to allocate about a quarter million dollars to student organizations.

Several concerns from Gator affiliated Senators are due to how funding is being allocated, and Santiago Perez's ruling on certain motions, which they deemed an abuse of power.

Budget and Appropriations Committee Chairman Blake Cox (Gator-District A) believes the entire budget is now invalidated given the passing of Amendment 1, he said.

Mia argued Pierre and Cox had an inaccurate view, citing the record from the official minutes

"Procedure has been followed," Mia said.

Budget and Appropriations Committee Vice Chairman and Sen. John Brinkman (Independent-District B) strongly opposed the budget Tuesday due to a severe violation of proper procedure during its handling, he said.

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Brinkman affirmed the budget was previously amended in clear defiance of the Senate Rules and Procedures, and the voter records speak for themselves, he wrote.

"The amendment didn't pass with enough votes in the first place," Brinkman wrote. "It's deeply troubling that Senate president Oscar Santiago Perez actively chose to distort the truth in order to push through this budget."

More

Gators distance runners shine in Arkansas Invitational

'Come on out and have a beer!': Inaugural Gainesville beer mile ran for important cause

Majority Party Leader Simone Liang (Change-CLAS) and Mia addressed the removal of Sen. Timothy Sinclair (Change-CLAS) from the Chambers in public comment.

They both stated Sinclair went through some personal family grievances, and the Rules and Ethics Committee did not find his circumstances good enough.

Senator Zoe Richter (Change-CALS) spoke on Sinclair's removal alongside Judiciary Vice Chairperson Joaquin Marcelino (Change-District D).

Both Richter and Marcelino serve on the Rules and Ethics Committee and asked for the decision to be reconsidered.

By the end of the debate and deliberations, the Senate voted to rescind the decision of the committee.

Sinclair's removal from the chamber due to half-absences on past incomplete voter records will be up for reconsideration at the next Senate meeting.

The Fall 2023 reapportionment bill authored by the Ad-Hoc Committee on Fall 2023 Apportionment Realignment became another point of contention. The committee created the bill as a result of the SG Supreme Court case, Students for Fair Representation v. Halle.

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In the case, several District A residents claimed the apportionment crafted last Summer affected their representation. The court did not vote to adopt their remedial.

Gator Senators proposed one at-large off-campus district that would encompass all 36 off-campus Senate seats. Change Senators contended the move would dilute off-campus voters' representation.

Judiciary Chairperson Jonathan C. Stephens said without an apportionment map, the committee will have failed its constituents by jeopardizing the representation of thousands of students, they wrote in a press release.

After a roll call vote of 31 to 30, a motion to bring the bill to the floor failed.

Nearing the end of the meeting, Santiago Perez signed two bills. They signed the Resolution Condemning Florida Board of Governors' Decision to Ban Asian Social Media Platforms at Public Universities, authored by Budget and Appropriations Committee Clerk Michael Lim and Sen. Laurie Wang (Gator-Freshman). The second was a Resolution Recognizing the Outstanding Efforts of SG Adviser Jerome Scott II, authored by Mia.

Contact Vivienne at vserret@alligator.org. Follow her on Twitter @vivienneserret.

Exhibit 9H: Supreme Court's injunction and implementation of the at-Large map via '*Fall 2023 Election Map*'

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided September 5, 2023

In Re Fall 2023 Election Map

VAN DE BOGART, C.J. delivers the order.

INJUNCTIVE ORDER

The Court has found cause to enter an injunction.

IT IS HEREBY ORDERED that the University of Florida Student Government Senate shall adopt the following apportionment map for the Fall 2023 Election.

Beaty Towers.....1

Broward-Rawlings Area.....1

Graduate and Family Housing….....1

Graham Area.....1

Honors Village.....1

Hume Area.....1

Infinity Hall.....1

Jennings Area.....1

Keys-Springs Residential Complexes..1

Lakeside Residential Complex.....1

Murphree Area.....1

Tolbert Area.....1

Yulee Area.....1

All Off-campus.....37

IT IS SO ORDERED.

BROWN, J., FREEMAN, J., and DEAS, J. concur.

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided September 5, 2023

In Re: Fall 2023 Election Map

BROWN, J. delivers the opinion of the Court.

The Court takes no pleasure in deciding the matter before it; however, the matter is of the utmost importance. Before the Court comes a question as to the apportionment of Senate seats for the Fall 2023 Student Election. The Petitioners requested that this Court "order the Supervisor of Elections . . . . in his capacity as a Student Government Official, to adopt Petitioner's proposed remedial apportionment of seats for the Fall 2023 Student Senate election."

First, under the jurisdiction cited by the Petitioners, the Court interprets Article III Section 2(a) and Article III Section 3 in light of other authorities and circumstances listed by the Petitioners. Second, the Court addresses its motivations for stepping into the shoes of the Judiciary Committee to craft an apportionment map, when it has previously declined to do so. Finally, the Court specifies its reasoning for selecting the final Fall 2023 apportionment map. Ultimately, after weighing and measuring the evidentiary record in this case, the Court has found it lacking thus forcing it to agree with the Petitioners' map.

I. Jurisdiction

Article V, Section 3(b)(1)(B) of the University of Florida Student Body Constitution ("Constitution") states that "[The Supreme Court shall interpret any provision of the constitution or any law upon written] request of the Student Body President." In the present case, Student Body President Olivia Green's (the "SG President") signature under the "Signatures of Petitioners" section of the petition meets the requirement for jurisdiction under Article V, Section 3(b)(1)(B) of the Constitution for the Court to interpret Rules XI (3)(b)(iv) and Rule XI (3)(d)(i) of the Senate Rules.

Additionally, Article V, Section 3(b)(2) of the Constitution states that the Supreme Court shall, upon written petition of any member of the Student Body and for good cause shown, order any Student Government official or any officer of a student organization that receives Student Body funds to perform any lawful act or refrain or desist from an unlawful act. Here, Petitioners request that the Court order the "Supervisor of Elections . . . in his capacity as a Student Government Official . . . adopt Petitioner's proposed remedial apportionment of seats for the Fall 2023 Student Senate election."

II. Background

In April 2023, this Court held in *Students for Fair Representation vs. Halle* (Vol. 4, 21) that SSB 2022-1035 Senate Reapportionment Act of 2023 was unconstitutional because District A was not apportioned on the basis of population as nearly equal as practicable. The opinion states, "[t]he Court is not a legislative body, and as such, need not step into the shoes of the legislator to craft a

constitutional, remedial apportionment of off-campus seats." The Court further ordered the Student Senate to reapportion "as soon as reasonably practicable" in its opinion.

Moving into the Summer 2023 semester, the Senate failed to do as the court ordered it to. The Judiciary Committee failed to meet quorum for the entirety of the Summer A Academic Semester and the two first weeks of the Summer B Academic Semester. Concurrently, during the Summer A term, an Ad-Hoc Committee was created to create an alternative forum to draft and pass an apportionment bill. The Ad-Hoc Committee approved SSB 2023-1133: The Fall 2023 Apportionment Realignment Act (the "FARA"). The Senate ultimately failed to approve this apportionment map.

Subsequent to the creation of the Ad-Hoc committee, and the end of attempts to pass an apportionment map through the usual Judiciary Committee channels, the SG President submitted the petition which is the subject of this opinion.

III. Analysis

For the following reasons the Court has assumed the constitutionally assigned role of the Senate and chosen an apportionment map:

Ad-Hoc Committee

One Counter-petitioner asserts that the SG President should have attempted to pass their map through the Ad-Hoc Committee formed by the Judiciary Committee. This argument, however, requires the assumption that the Ad-Hoc committee was a valid method of drafting and submitting an apportionment map for approval by the Senate. Legislation approved by the Ad-Hoc Committee and not the Judiciary Committee, however, subverts the process outlined in Rule XI (3)(b)(iv) and Rule XI (3)(d)(i) of the Rules and Procedures of the Student Senate. Rule XI (3)(b)(iv) explicitly states that the "*Judiciary Committee* will, before every Fall general election, submit to the Senate legislation regarding the apportionment of the Senate" (emphasis added). Furthermore, Rule XI (3)(d)(i) in relevant part clearly states that "[t]he *Judiciary Committee* will draft legislation to set the apportionment of the Senate" (emphasis added). The Court views these provisions as stating in a unified voice that the Judiciary Committee, *and not its designee*, is responsible for the drafting and submission of apportionment legislation to the Senate. To hold otherwise would be procedurally problematic and violate all basic rules of the cannons of construction.

Reasonable Time

Even if legislation passed through the Ad-Hoc Committee were to be valid per the student codes, which it is not, the Student Senate has simply run out of time to pass an apportionment bill given the timeline that exists for doing so. Under Student Body Statute 700.4(1), "election cycle" means the time from the beginning of the informational meeting held by the Supervisor of Elections, which is to be held on Tuesday, September 5, 2023 (the date of the hearing for this petition), until validation of the election by the Student Senate. Then, Article III Section 8(b) of the Constitution, states that the SG President shall have ten days to veto the bill after presentment. Article III Section 8(d) further provides that the University President or their designee shall have the ability to veto

the bill and that the SG President has up to ten days to provide the Senate with the SG President's reasoning for vetoing the legislation. Moving forward with an apportionment bill at this time would have directly subverted the SG President and University President's constitutional right to veto. Therefore, any legislation that could be passed at this time would not be constitutionally valid for implementation for an additional ten days at minimum. This of course is not practicable as the election cycle has already begun. For that reason, the Supreme Court is the only power with the ability to approve an apportionment map in time for the Fall 2023 election cycle.

Separation of Powers

This Court is not in the business of overstepping boundaries of constitution and assuming the duties of the other branches of government that exist at the University of Florida. However, Petitioners and both Counter-petitioners agree, the Court has no other option but to step in to ensure that the "right to vote in Student Government elections," that they all cite in their briefs, is protected. The Court's main considerations under this issue are (1) the Court's previous addressal of the issue of a constitutional apportionment in the Spring of 2023; (2) the ample time with which the Senate had to address this matter; and (3) the United States Supreme Court's recent holding, in *Moore v. Harper*, that apportionment maps are not without review by the judicial branch.

Finally, as the highest level of the judiciary of the flagship university in the state of Florida, this Court abides by the *League of Women Voters of Fla. v. Detzner* precedent in seeking to fulfill its "obligation to provide certainty" to student voters "regarding the legality" of the Student Government Fall 2023 election map as it is "an essential right of our citizens to have a fair opportunity to select those who will represent them," as cited by Petitioners.

With all of these considerations in mind, the Court does not view this circumstance as violating its dedication to the principles of separation of powers. This situation is truly extraordinary and one without comparison in the historical record. Were the Court not to step in, the democratic process of the Student Government of the University of Florida would come to a halt thus subverting the rights of the entirety of the student body. This, of course, is an untenable result. In dissent, Justice Rolle argues that the Court should give deference to the legislative branch and the Judiciary Committee as they are the parties assigned the role of apportioning Senate seats. However, judicial deference is not called for in this situation. Judicial deference is called for in situations where the other branches have carried out their assigned duties and in doing so made novel decisions that require constitutional interpretation. In those cases, the Court provides deference in the borderline cases that have no objectively clear answer. Here, the very issue is inaction and the answer is clear. As such, judicial deference is inapplicable in this situation. Hence, the Court discerns no constitutional concern in intervening in this particular case. Moreover, if such an issue did exist, the rights of the student body would necessitate the Court's intervention to safeguard the democratic process.

For the following reasons the Court chooses the map submitted by the Petitioners:

Unverified Data

All parties agree that the Court was placed in a position where it was the only avenue for approving an apportionment map in time for the Fall 2023 elections. The Court was presented with three maps that could not be more dissimilar. The decision for the Court came down to two maps as choosing the third option would have required the Court to abolish a portion of the Constitution, which was both not called for by the Petitioners and was an argument wholly lacking basis in the law.

The Court was provided with two separate sets of data for use in drafting an apportionment map, one from the Petitioners and another from one of the Counter-petitioners. The Court was unable to verify the validity and accuracy of the set of data submitted by the Counter-petitioners as they failed to submit any documentation for their data. The Court regrets this unfortunate circumstance; however, the Court is unable and unwilling to remedy this issue by considering evidence outside of the four corners of the documents already available to it as doing so would violate every principle of the Rules of Evidence. In her dissent, Justice Rolle recognizes the cold and strict nature of the Rules. The Rules leave no room for exceptions once the proceedings have started. As such, the Court was unable to assess the constitutionality of the apportionment map submitted by the Counter-petitioner and was left only with the map provided by the petitioner, which does not require the use of authenticated data as one seat is allocated to each on campus area and all previous off campus districts became one thus requiring no consideration of data.

IV. Conclusion

THEREFORE, the Court holds in favor of the Petitioners and **ORDERS** that the apportionment map submitted by Petitioners be used for the Fall 2023 election. The Court does not reach the question of the constitutionality of an all at-large apportionment of off campus seats outside of extraordinary constitutional circumstances.

It is so ordered.

VAN DE BOGART, C.J., FREEMAN, J., DEAS, J. concurring.

ROLLE, J., dissenting.

Let the record show that I agree with the Majority that the Court has a duty to provide relief on behalf of the University of Florida student body amidst this unprecedented circumstance. As Justice Brown states, it was the task of the Legislative branch, more specifically the Judiciary Committee, to present a map for reapportionment this Fall 2023 election cycle. Though the reason underlying repeated failure to meet quorum is not the subject matter before us, it is a pertinent detail currently in contention.

The functionality of the current Legislative branch is abysmal, leaving the Court with a tall task. The Majority and Minority party leaders have failed to come together to create a map that is approved by all, missing an opportunity for both sides of the aisle to act in the best interest of their constituents. That being said, the student body deserves nothing short of a fair, just, and well-planned map. Unfortunately, this shortcoming of the Legislative branch has effectively caused a transfer of the powers conferred to the Legislative branch unto the Judicial branch. Though my fellow Justices believe the data Counter-petitioner Santiago Perez provided is unverified and therefore unusable, I heed deference to the powers vested in the Legislative branch.

It is wholly unimaginable to me that the Legislative branch, further the Judiciary Committee Chair himself arguing before us today, would use data that is inaccurate to form the basis of their map. If the Majority and Minority parties would have simply made quorum to vote on the map prior to the deadlines my colleagues laid out, the Counter-petitioner's data would be put to use. No questions would come from the Court, nor the Executive branch, and we would all feel as though due diligence was aptly applied, simply by resting on the knowledge of the powers vested in the Judiciary Committee and the oath they have made to the University of Florida student body.

The Legislative branch of Government is a fact-finding branch. Its main tasks are to investigate and pass legislation based on factual discoveries. While the Judicial branch is too a fact-finding branch, it is from an adjudicative lens. Our concept of facts within the Court is on the basis of the rules of evidence, which are a strict and very formal process. In contrast, the Legislative branch conducts their factual analysis in a much less formulaic way. Thus, this distinction in the means of operation between our two branches would lead to a presentation of data that was insufficient for this Court, but acceptable for the Judiciary Committee.

I acknowledge why my fellow Justices feel that this reasoning is enough to select the Petitioner's map. However, I hold a very strong sense of deference to the Committee that was tasked to create this map. There is a time and a place to make an example of an individual's procedural errors; I believe that doing so in this case alters the purpose of the Judiciary Committee. Though the data is missing a stamp of verification from the source it is derived from, I am still inclined to believe that the Counter-petitioner, as Chair of the Judiciary Committee responsible for crafting this apportionment map, has much greater knowledge than the Court or the other Petitioners regarding the potential effects of apportionment, and therefore took greater care and understanding in creating their map. This is not a factual error, nor did any Justices express they believed the data to be falsified or incorrect (even later giving the data some validity by entertaining the 2nd Murphree seat), but rather a misstep in creating the exhibits. Just as the Supreme Court of the United States recognizes and follows judicial deference when so called to, I believe this Court is compelled to uphold this principle as well. Thus, I simply cannot agree with the Petitioner's map, and entrust my faith in the Counter-petitioner's map. I respectfully dissent.

Exhibit 9I: 2023 Independent Alligator article on Supreme Court's injunction and implementation of the at-Large map with interviews from Petitioners and Counterpetitioners

NEWS | CAMPUS STUDENT GOVERNMENT

UF Supreme Court passes Gator Party's Fall 2023 Apportionment map

The new map will have 37 at-large seats

By Vivienne Serret
September 5, 2023 | 11:58pm EDT

Generic SG Photo by Katie McNamara | The Independent Florida Alligator

The UF Supreme Court ruled 4-1 in favor of a districting map that consists of 37 at-large seats with some dorm seats being altered — making the Fall 2023 election a winner takes all.

The court met Sept. 5 to hear the petition filed by Gator Party affiliated members about the Fall 2023 Apportionment map, which could impact who represents students in the upcoming Fall election.

UF Student Body President Olivia Green, Rules and Ethics Committee Chairwoman Lililana Clark (Gator-District A) and former Minority Party Leader Bronson Allemand (Gator-District A) submitted the initial petition.

UF Senate President Oscar Santiago Perez (Change-District D) submitted a counter-petition to the UF Supreme Court, appointing Judiciary Chairperson Jonathan C. Stephens (Change-District D) to argue the case on their behalf.

Another counter-petition was submitted to the court by former Communist Party Leader Alfredo Ortiz.

Murphree will have one representing seat, and Keys and Springs Residential Complex will be combined into one seat.

Acting Chief Justice Julia Van De Bogart called the meeting to order at 6:01 p.m. and ended at around 7:30 p.m. due to further deliberations. Quorum was established with five judges present.

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Gainesville RTS cancels contract with disability van service, launches in-house app
By Marla Arruda | Jan. 28

Florida universities are one step closer to a yearlong pause on H-1B visas
By Leona Masangkay | Jan. 29

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Petitioners' argument

Allemand contended in his opening statement UF's registrar data was not accurate and could not properly represent the student body.

He brought up Clark, who resides in her representing district, but UF registrar data didn't accurately reflect her location for Fall 2021 or 2022.

Allemand cited parts of the submitted petition, which stated there are 60,743 people listed as students and 10,931 do not have a local ZIP code listed, according to the Fall 2022 data from the Office of the University Registrar.

The data showed 18% of the Student Body population wasn't accounted for when apportioning seats for the Senate, the petition argues.

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"It is evident that data cannot be used which is this inaccurate, and there must be an alternative model to avoid problems concerning the truth that it is impossible to definitively state that one can have an accurate picture of how many UF students live in specific parts in or outside of Gainesville," the statement read.

Allemand addressed some of the concerns surrounding minority groups not being represented with their map model, emphasizing their map would be able to include more of the student body over the counter-petitioners.

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Senate president's counter-petition argument

Santiago Perez's case was argued on behalf of Stephens, who contended the petitioner's map would harm diverse groups of students and minorities by inadequately representing them.

"The actions of the petitioner's map, after clear analysis of the fact pattern, demonstrates a level of gross negligence of public and professional duty that could by any reasonable analysis be deemed intentional," the counter petition read.

Only one judge voted in favor of Santiago Perez's counter petition.

During the deliberation period, several judges said they wished for Gator and Change Party members to have been able to work together during the Summer to form a map in a timely manner.

Stephens emphasized the Judiciary Committee failed to meet quorum nearly the entire Summer, which led to forming an Ad-Hoc Apportionment committee in an attempt to create a better map.

Stephens believes the petitioner's map has harmed minority voices and was created to secure political power within Student Government.

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Counter-petitioner Ortiz's argument

Ortiz contended that a better alternative would be a mixed-member proportional representation map — the court did not vote in favor of his alternative.

"I presented the Court with an opportunity to guarantee students proportional representation and avoid the appearance of a power grab. Unfortunately, the Court declined," Ortiz wrote. "In doing so, the Court left it up to the voters to decide whether or not Senators should be punished for preventing the peaceful transfer of power between parties."

Contact Vivienne Serret at vserret@alligator.org. Follow her on Twitter @vivienneserret.

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Exhibit 9J: Supreme Court prevents Change Party from passing a budget bill through their sponsored amendments via '*Santiago Perez & Stephens v. Pierre*'

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided September 14, 2023

Santiago Perez & Stephens v. Pierre

VAN DE BOGART, C.J. delivers the opinion of the Court.

Before the Court comes a question about the validity of the Student Body Treasurer's line-item veto of Student Senate Bill 2023-1115, the 2024-2025 Activity and Service Fee Budget. The Petitioners requested that this Court (1) nullify the Student Body Treasurer's line-item vetoes and order the Student Body Treasurer to either sign the Bill in its entirety, veto the Bill in its entirety, or allow for the ten-day period to pass and (2) hold Student Body Statute 821.7 to be unconstitutional. This Court denies both requests for relief, finding that the Student Body Treasurer's line-item veto was permissible under Student Body Statute 821.7 and Article III, Section 8(e) of the Student Body Constitution.

I. Jurisdiction

The Court has jurisdiction to hear this petition under Article V, Section 3(b)(2) cited by the Petitioners, "[The Supreme Court] shall, upon written petition of any member of the Student Body and for good cause shown, order any Student Government official or any officer of a student organization that receives Student Body funds to perform any lawful act or refrain or desist from an unlawful act."

The Petitioners also cite Article V, Section 3(b)(1) to gain jurisdiction, that "[The Supreme Court] shall interpret any provision of the constitution or any law upon written petition of twenty members of the Student Body; or request of the Student Body President."

II. Background

Per the Counterpetitioner's filing with this Court, on July 18, 2023, Student Senate Bill 2023-1115 underwent its first reading during the Student Senate meeting. After the presentation, question and answer, debate, and final privilege, the Senate President held a vote for Amendment 1. Then, the voter record states that 29 Senators voted in the affirmative, 34 voted in the negative, and there was one incorrect voter record. Despite the lack of a majority vote, the Senate President still passed the Amendment, which was incorporated into the Bill and subsequently passed during second readings on the July 25, 2023, Senate meeting. The Student Body Treasurer then submitted a veto by line item of all lines affected by Amendment 1 on August 17, 2023. The Petitioners declined to respond to questions regarding the Counterpetitioner's statement of facts during oral argument.

Then, on August 23, 2023, the Petitioners filed their petition with the Court, arguing that the federal Line Item Veto Act of 1996, the U.S. Supreme Court's holding in *Clinton v. City of New York* (1998), and Article III, Section 8(a) of the Florida Constitution outlines why giving the Student Body Treasurer the power to line-item veto "would violate the presentment clause within our Student Body Constitution."

III. Analysis

Although the Student Body Constitution does not specifically indicate that the Student Body Treasurer nor the President has the authority to enact line-item vetoes of any legislation presented to them, the Student Body Constitution includes their ability to veto. Then, Student Senate Bill 2023-1115 expands upon this authority to veto by including that "Each budget or line item removed from the Activity and Service Fee Budget by the Student Body President or Student Body Treasurer by line-item veto shall recur on the floor of the Student Senate no later than fifteen (15) calendar days after the last veto message has been submitted to the Senate President." Given that the Student Body Treasurer executed her line-item veto within the required calendar days under the Student Body Statute, and the Student Body Constitution does not explicitly address the issue but rather cites the action of vetoes generally, this Court is not inclined to find that Student Body Treasurer line item vetoes are unconstitutional.

Further, during oral argument, the Student Body Treasurer mentioned how the Student Body Constitution was last amended in 2016, almost twenty years after the U.S. Supreme Court decided *Clinton v. City of New York*, but still did not include a provision about the requirement that vetoes be utilized only as to the entirety of legislation. The Court finds this argument persuasive. Additionally, the Court seeks to clarify that Court decisions about veto power are about the veto power under Student Body Statutes and the Student Body Constitution, not the U.S. Constitution. If the Court interpreted every issue that came before it under federal or state law instead of student government law, there would be no need for the University of Florida to have its own student government laws.

Moreover, in an educational, student-government setting, the assumed facts of this case color the situation and make way for why the Court declines to step in the shoes of the legislative branch. Also, both Petitioners are, notably, members of the legislative branch, as the Senate President and Judiciary Committee Chair, so the Court encourages them to find change through the legislative process if they choose to continue to pursue their claims.

IV. Conclusion

THEREFORE, this Court denies the Petitioners' requests for relief and grants the Counterpetitioner's request for relief, holding that the Student Body Treasurer acted within their authority by line item vetoing Student Senate Bill 2023-1115 under Article III, Section 8(e) of the Student Body Constitution and Student Body Statute 821.7.

It is so ordered.

BROWN, J., DEAS, J., FREEMAN, J., and ROLLE, J., concurring.

Exhibit 9K: Fall 2023 election results where the new FBK-backed Vision Party won every off-campus seat under the new at-Large, off-campus district model

https://sg.ufl.edu/wp-content/uploads/2024/10/2020-2029-Election-Results-Fall-2024-Update2.pdf

Off Campus Senator - 37 seats

✔ Aaron Amster	✔ Vision Party	4455 - 1.67% (29 votes from absentee ballots)
✔ Bianca Barrios	✔ Vision Party	4438 - 1.66% (26 votes from absentee ballots)
✔ Halle Burton	✔ Vision Party	4400 - 1.65% (26 votes from absentee ballots)

✔ Maya Idiculla	✔ Vision Party	4374 - 1.64% (25 votes from absentee ballots)
✔ Abby Whitaker	✔ Vision Party	4374 - 1.64% (28 votes from absentee ballots)
✔ Catherine Isakson	✔ Vision Party	4340 - 1.62% (25 votes from absentee ballots)
✔ Gabriela Prieto	✔ Vision Party	4327 - 1.62% (25 votes from absentee ballots)
✔ Zachary Arzt	✔ Vision Party	4322 - 1.62% (29 votes from absentee ballots)
✔ Megan McGuire	✔ Vision Party	4322 - 1.62% (25 votes from absentee ballots)
✔ Julia Seifer	✔ Vision Party	4319 - 1.62% (27 votes from absentee ballots)
✔ Nicole Gigliotti	✔ Vision Party	4317 - 1.62% (26 votes from absentee ballots)
✔ Noor Azeem	✔ Vision Party	4308 - 1.61% (25 votes from absentee ballots)
✔ Samantha Kinggard	✔ Vision Party	4305 - 1.61% (26 votes from absentee ballots)
✔ Laurel Wentworth	✔ Vision Party	4299 - 1.61% (27 votes from absentee ballots)
✔ Angelina Fentress	✔ Vision Party	4290 - 1.6% (26 votes from absentee ballots)
✔ Aleah Henley	✔ Vision Party	4282 - 1.6% (25 votes from absentee ballots)
✔ Laura Jane Bryan	✔ Vision Party	4276 - 1.6% (25 votes from absentee ballots)

✔ Monish Vijayaraghavan	✔ Vision Party	4232 - 1.58% (26 votes from absentee ballots)
✔ Jason Drucker	✔ Vision Party	4230 - 1.58% (24 votes from absentee ballots)
✔ Annabella Vigna	✔ Vision Party	4224 - 1.58% (26 votes from absentee ballots)
✔ Gabriel Filomino Vargas	✔ Vision Party	4222 - 1.58% (25 votes from absentee ballots)
✔ John Brinkman	✔ Vision Party	4197 - 1.57% (24 votes from absentee ballots)
✔ Christian Jubran	✔ Vision Party	4189 - 1.57% (24 votes from absentee ballots)
✔ Kishan Nayak	✔ Vision Party	4186 - 1.57% (24 votes from absentee ballots)
✔ Matthew Reich	✔ Vision Party	4184 - 1.57% (25 votes from absentee ballots)
✔ Jonathan Bedine	✔ Vision Party	4177 - 1.56% (25 votes from absentee ballots)
✔ Joah Levine	✔ Vision Party	4175 - 1.56% (25 votes from absentee ballots)
✔ Marian Enriquez	✔ Vision Party	4161 - 1.56% (26 votes from absentee ballots)
✔ Coe Leavengood	✔ Vision Party	4154 - 1.55% (25 votes from absentee ballots)
✔ Wesley Littleton	✔ Vision Party	4151 - 1.55% (24 votes from absentee ballots)
✔ Evan Rafanan	✔ Vision Party	4148 - 1.55% (26 votes from absentee ballots)

✔ Roman Quattrocchi	✔ Vision Party	4145 - 1.55% (26 votes from absentee ballots)
✔ Damian Rodriguez	✔ Vision Party	4139 - 1.55% (25 votes from absentee ballots)
✔ Aaron Rubaii	✔ Vision Party	4138 - 1.55% (25 votes from absentee ballots)
✔ Aditi Sarkar	✔ Vision Party	4134 - 1.55% (27 votes from absentee ballots)
✔ Jason Von Holten	✔ Vision Party	4127 - 1.54% (27 votes from absentee ballots)
✔ Conor Ruffin	✔ Vision Party	4111 - 1.54% (24 votes from absentee ballots)
Hana Ali	Change Party	3085 - 1.15% (9 votes from absentee ballots)
Lauren Carlson	Change Party	2966 - 1.11% (8 votes from absentee ballots)
Faith Corbett	Change Party	2966 - 1.11% (9 votes from absentee ballots)
Annika Singh	Change Party	2946 - 1.1% (8 votes from absentee ballots)
Ria Pai	Change Party	2939 - 1.1% (8 votes from absentee ballots)
Hunter Allen	Change Party	2917 - 1.09% (8 votes from absentee ballots)
Lauren Shaw	Change Party	2910 - 1.09% (7 votes from absentee ballots)
Kacie Ross	Change Party	2898 - 1.08% (7 votes from absentee ballots)

Christian Rodriguez	Change Party	2891 - 1.08% (7 votes from absentee ballots)	[redacted]
Dwight Brown II	Change Party	2884 - 1.08% (9 votes from absentee ballots)	[redacted]
Taimoor Nawaz	Change Party	2882 - 1.08% (8 votes from absentee ballots)	[redacted]
Max Kappalman	Change Party	2877 - 1.08% (8 votes from absentee ballots)	[redacted]
Aron Ali-McClory	Change Party	2873 - 1.07% (8 votes from absentee ballots)	[redacted]
Michael Lim	Change Party	2872 - 1.07% (8 votes from absentee ballots)	[redacted]
Nicholas Campione	Change Party	2870 - 1.07% (7 votes from absentee ballots)	[redacted]
Christian Rainer	Change Party	2864 - 1.07% (7 votes from absentee ballots)	[redacted]
Leif Holmstrom	Change Party	2860 - 1.07% (8 votes from absentee ballots)	[redacted]
Joaquin Marcelino	Change Party	2857 - 1.07% (8 votes from absentee ballots)	[redacted]
Antonio Hendricks	Change Party	2856 - 1.07% (8 votes from absentee ballots)	[redacted]
Rob Diaz	Change Party	2848 - 1.07% (7 votes from absentee ballots)	[redacted]
Anjali Natarajan	Change Party	2846 - 1.06% (8 votes from absentee ballots)	[redacted]
Cameron Driggers	Change Party	2844 - 1.06% (8 votes from absentee ballots)	[redacted]

Alexander Peterson	Change Party	2843 - 1.06% (7 votes from absentee ballots)	[redacted]
Jack Magalsky	Change Party	2837 - 1.06% (7 votes from absentee ballots)	[redacted]
Adler Cristello	Change Party	2836 - 1.06% (8 votes from absentee ballots)	[redacted]
Muhammad Ahmed Ebrahim	Change Party	2831 - 1.06% (8 votes from absentee ballots)	[redacted]
Nathan McGinnis	Change Party	2819 - 1.05% (8 votes from absentee ballots)	[redacted]
Jeff John	Change Party	2818 - 1.05% (7 votes from absentee ballots)	[redacted]
Hunter Monson	Change Party	2814 - 1.05% (7 votes from absentee ballots)	[redacted]
John Rassel	Change Party	2801 - 1.05% (7 votes from absentee ballots)	[redacted]
Matthew Wolf	Change Party	2794 - 1.05% (6 votes from absentee ballots)	[redacted]
Timothy Sinclair	Change Party	2790 - 1.04% (8 votes from absentee ballots)	[redacted]
Viswanath Nair	Change Party	2787 - 1.04% (8 votes from absentee ballots)	[redacted]
Joshua Valan	Change Party	2787 - 1.04% (6 votes from absentee ballots)	[redacted]
Logan Wax	Change Party	2782 - 1.04% (7 votes from absentee ballots)	[redacted]
Jonathan Stephens	Change Party	2725 - 1.02% (7 votes from absentee ballots)	[redacted]

Stephen Sykes	Change Party	2699 - 1.01% (6 votes from absentee ballots)	
Mia Ciceri	Pizza Party	597 - 0.22% (2 votes from absentee ballots)	
Robert Casper	Pizza Party	449 - 0.17%	
Maxwell Griffin	Pizza Party	400 - 0.15% (1 votes from absentee ballots)	
Colin Clark	Pizza Party	399 - 0.15% (2 votes from absentee ballots)	
Alfredo Ortiz	Independent	352 - 0.13% (3 votes from absentee ballots)	
Eric Torres	Pizza Party	351 - 0.13% (2 votes from absentee ballots)	
Matthew Prakash	Pizza Party	345 - 0.13% (1 votes from absentee ballots)	
Frank Hutchinson	Pizza Party	335 - 0.13% (1 votes from absentee ballots)	
Connor Lausch	Pizza Party	335 - 0.13% (1 votes from absentee ballots)	
Anthony Leoncio	Pizza Party	329 - 0.12% (1 votes from absentee ballots)	
Holden Zeichner	Independent	259 - 0.1% (2 votes from absentee ballots)	
Jake Greenwell	WRITE-IN	10 - 0%	
Tyler Della Noce	WRITE-IN	3 - 0%	
Pratul Parida	WRITE-IN	3 - 0%	
Stephen Goodfellow	WRITE-IN	3 - 0%	

10/4/23, 9:14 PM		Results
Michael Polloway	WRITE-IN	2 - 0%
YOUR MOM	WRITE-IN	2 - 0%
Dylan Mccarrick	WRITE-IN	2 - 0%
Makenzie Marez	WRITE-IN	2 - 0%
Jaden Sproul	WRITE-IN	2 - 0%
Bebe Gardner	WRITE-IN	2 - 0%
Haroon Sindhu	WRITE-IN	2 - 0%
Harambe	WRITE-IN	2 - 0%
David Stevens	WRITE-IN	2 - 0%
Yogesh Patel	WRITE-IN	2 - 0%
Santiago Alvarez	WRITE-IN	2 - 0%
donald Trump	WRITE-IN	2 - 0%
John Green	WRITE-IN	2 - 0%
Adrian Alonso	WRITE-IN	2 - 0%
Samuel Riffice	WRITE-IN	2 - 0%
David Schnoor	WRITE-IN	2 - 0%
Adam Wilking	WRITE-IN	2 - 0%
Joseph Antonacci	WRITE-IN	2 - 0%
Jake Inguardi	WRITE-IN	2 - 0%
Brennen Gil	WRITE-IN	2 - 0%
232 losing write-in candidates with 267 votes		

Exhibit 9L: PRR'd audio recording uploaded on YouTube by UFSG-SPAN of the Vision Party-controlled Judiciary Committee codifying the at-Large, off-campus district during July 22, 2024 meeting under Student Senate Bill 2024-1525: Fall 2024 Reapportionment Act under the rationale that a lack of data from the Registrar's Office has justified its creation despite alternative solutions and concerns of apportionment data, voter dilution, and discrimination from Change Party members

Video 1: https://www.youtube.com/watch?v=wnQw7hPKhCc

Exhibit 9M: Vision Party passes SSB 2024-1525: Fall 2024 Reapportionment Act, signed by Vision-aligned Student Body President John Brinkman

UF UNIVERSITY of FLORIDA

Student Senate

3000 J. Wayne Reitz Union
PO Box 118505
Gainesville, FL 32611
352-392-1665

STUDENT SENATE BILL 2024-1525

TITLE: Fall 2024 Reapportionment Act

AUTHOR(S): Judiciary Chairman Aaron Rubaii

SPONSOR(S):

CHAPTER 322 APPORTIONMENT (67-107, 72-118, 72-172, 72-183, 75-184, 77-123, 79-127, 80-180,81-142, 82-147, 83-176, 84-104, 84-149, 87-150, 87-156, 87-164, 88-122, 89-122, 90-124, 90-149, 91-107, 91-131, 92-105, 92-129, 94-114, 94-115, 94-122, 95-121, 96-107, 96-130, 97- 134, 98-102, 98-118, 99-101, 99-123, 2000-133, 2001-129, 2002-147, 2004-127, 2004-128, 2005- 126, 2005-129, 2005-132, 2005-143, 2007-140, 2007-143, 2008-110, 2008-141, 2009-124, 2010- 114, 2011-124, 2011-125, 2012-112, 2013-113. 2014-116, 2014-117, 2015-109, 2016-118, 2016- 119, 2017-111, 2017-112, 2018-121, 2018-122, 2019-1092, 2019-1093, 2020-1022, 2020-1056, 2021-117, 2022-113, 2024-100).

322.1 The fifty (50) members of the Student Senate elected in the Fall elections shall represent districts by residence.

322.11 Fall Student Senators must physically reside the majority of their time in the location ~~district~~ they seek to represent while attending the University of Florida at the time of their election or appointment.

322.12 Fall Student Senators must continue to physically reside the majority of their time in the location ~~district~~ that they represent during their term of office, except as provided for in Section 340.12 (2), S.B.S.

322.13 For the period of time between the end of the Spring semester and the beginning of the Fall term, Student Senators may use the residence of their Spring semester to determine their district of residence.

322.2 On-campus shall be defined as University of Florida residence halls and graduate and family housing controlled by the Department of Housing and Residence Life.

322.21 All on-campus residents will elect Student Senators by districts based upon where they physically reside while attending the University of Florida. On-campus districts shall be apportioned as follows:

Beaty Towers..... 1
Broward-Rawlings Area.....1

Graduate and Family Housing.....1
Graham Area.....1
Honors Village.....1
Hume Area.....1
Infinity Hall.....1
Jennings Area.....1
Keys-Springs Residential Complexes.....1
Lakeside Residential Complex.....1
Murphree Area.....1
~~Springs Residential Complex.....1~~
Tolbert Area.....1
Yulee Area.....1

322.3 Off-campus shall be defined as all locations not included in residence areas listed in Section 322.2, S.B.S.

322.31 All off-campus residents will elect Senators ~~in districts~~ based upon where they physically reside while attending the University of Florida. Off-campus ~~districts~~ shall be apportioned as follows:

~~District A: ZIP Codes 32601, 32609, 32614, and all other locations not included within the ZIP codes listed below.....10~~
~~District B: ZIP Codes 32603, 32605, 32606, 32653.....8~~
~~District C: ZIP Codes 32607.....7~~
~~District D: ZIP Codes 32608.....12~~
Off-Campus.....37

~~322.311 District A excludes ZIP codes in which students cannot physically reside, including but not limited to 32604, 32610, and 32611.~~

322.32 Off-campus Student Senate seats shall be identified by a number designated after each Fall election by alphabetical order~~, where the first letter is the district and the last two digits form the seat number within each district (for example A-07).~~ The appointment or selection of replacement Student Senators shall not alter Student Senate seat designations. This is for the purpose of identification and management.

322.4 The fifty (50) Spring Student Senators will be elected by the classification formed into voting districts, with each college and independent school guaranteed at least one Student Senator, remaining seats will be allocated by relative student population of the college. The following designates the voting districts and the number of seats each college will have:

Fisher School of Accounting 1
Design, Construction, and Planning 1
Agricultural and Life Sciences..... 3
M.E. Rinker School of Building Construction..... 1
Heavener School of Business..... 3

Dentistry..... 1
Education 1
Herbert Wertheim College of Engineering..... 4
Arts..... 1
Graduate Students..... 12
Health and Human Performance..... 1
Public Health and Health Professions..... 1
Journalism and Communications.....1
Levin College of Law 1
Liberal Arts and Sciences 9
Medicine 1
Nursing..... 1
Pharmacy..... 1
Undergraduate Freshman Class..... 1
Undergraduate Sophomore Class..... 4
Veterinary Medicine..... 1

8/12/24
Monish Vijayaraghavan Date
Senate President

8/20/2024
John Brinkman Date
Student Body President

8/20/24
Date Sent to VPSL Office
Will be enacted if not vetoed within 10 days

Exhibit 9N: Supreme Court maintains constitutionality of at-Large map by denying voter dilution claims in 2024 case '*Stephens et al. v. University of Florida Student Government*'

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided on September 30, 2024

Stephens et al. v. University of Florida Student Government

DEAS, C.J. delivers the opinion of the Court.

This case involves a challenge to the constitutionality of Student Senate Bill 2024-1525, which establishes a single off-campus district for the Fall 2024 Student Senate election. Petitioners argue that this apportionment violates Article III, Section 2(a) of the University of Florida Student Government Constitution (UF SG Constitution) by contravening the framers' intent and violating the requirement for multiple off-campus districts. This Court rejects the Petitioners' argument and upholds the constitutionality of SSB 2024-1525.

I. Introduction and Jurisdiction

Article V, Section 3(b)(2) of the Constitution states that the Supreme Court shall, upon written petition of any member of the Student Body and for good cause shown, order any Student Government official or any officer of a student organization that receives Student Body funds to perform any lawful act or refrain or desist from an unlawful act. Here, Petitioners request that the Court (1) deem the Fall 2024 Election map under SSB 2024-1525 UNCONSTITUTIONAL due to it's violation of Article III, Section 2(a) of the UF SG Constitution, and (2) order the Supervisor of Elections to adopt Petitioners' proposed remedial map.

Jurisdiction is proper under Article V, Section 3(b)(1)(a) of the UF SG Constitution, which grants this Court authority to interpret any provision of the Constitution or law upon petition.

II. Petitioners' Argument

Petitioners contend that the creation of a single off-campus district is contrary to the framers' intent, as the plural term "off-campus areas" is used in the Constitution. They assert that (1) the framers intended for multiple off-campus districts and (2) that SSB 2024-1525's consolidation into one district dilutes student representation, thereby violating the mandate in Article III, Section 2(a), which requires that Senate seats be apportioned "on the basis of population as nearly equal as practicable."

In addition, Petitioners argue that the reapportionment is unconstitutional under Article I, Section 4, the Anti-Discrimination Clause, asserting that the single district configuration results in "impermissible vote dilution" and disrupts the political balance across distinct student communities.

III. Court's Analysis

Framers Intent

First and foremost, Petitioners' argument hinges on the interpretation that the plural form "off-campus areas" in Article III, Section 2(a) mandates multiple off-campus districts.

However, upon a plain reading of the Constitution, we find no express mandate for the creation of multiple off-campus districts. While the term "off-campus areas" is indeed plural, the use of this term does not necessarily indicate a rigid requirement for multiple districts, especially when weighed against practical considerations of reapportionment. The framers left room for flexibility in apportionment decisions based on population changes and the evolving needs of the student body. In fact, the Constitution only requires that the Student Senate apportion off-campus seats "on the basis of population as nearly equal as practicable"—a standard met by SSB 2024-1525.

Petitioners fail to provide any evidence of legislative intent supporting their argument that multiple off-campus districts are constitutionally required. Without a historical basis that corroborates the Petitioners' interpretation, this claim becomes speculative at best. Yet, Petitioners rely solely on an assumption of intent based on the use of the plural form "off-campus areas."

This Court agrees that the framers of the UF SG Constitution made deliberate word choices, particularly when structuring the apportionment model for on-campus representation. The level of specificity applied to on-campus apportionment was not extended to off-campus students, signaling the framers' deliberate decision to grant the Senate greater discretion in allocating off-campus seats. Article III, Section 2(a) of the UF SG Constitution outlines the framework for apportioning seats, specifically guaranteeing a minimum of one seat per "on-campus area government" and for "family housing residences." The framers added explicit guidance on how multiple dorms would be represented, indicating an intention to detail apportionment for on-campus residents. If the framers had intended a similar model for off-campus districts, they would have included explicit language to that effect, as they did for on-campus areas.

Instead, based on a plain reading, the framers entrusted the Senate with discretion to determine apportionment based on contemporary realities. This Court finds no evidence that such discretion has been abused.

Voter Dilution

Second, to demonstrate impermissible voter dilution, Petitioners would need to show that the creation of a single district consistently favors one political group over another. However, political parties in UF Student Government elections have been in constant flux. The two most prominent political parties—Vision and Change—have not been in existence long enough to form a discernible or consistent voting pattern. The Change party only entered UF politics in 2020, meaning it has appeared on the ballot for just four Fall elections. Similarly, the Vision party has only appeared on the ballot in a single Fall election. With only one election conducted under the current apportionment model, this Court finds no sufficient data to support the assertion of an identifiable political bias in the apportionment model.

Moreover, Petitioners make an unsubstantiated leap by suggesting that the combination of certain zip codes leads to vote dilution, especially along political or demographic lines. The Court notes that student government apportionment process is neutral and does not account for political affiliations, race, gender, or other protected characteristics. In fact, the Student Senate is not privy to this level of private information about students. Rather, the Senate relies soley on zip code data provided by the Office of the University Registrar, which is limited to basic geographic information about students. Without access to private student data, such a claim of intentional discrimination or voter dilution remains speculative.

IV. Conclusion

In sum, Petitioners have failed to demonstrate that the language of SSB 2024-1525 is contrary to the framers' intent or that it is unconstitutional. There is no legislative history or intent supporting the claim that multiple off-campus districts are required by the UF SG Constitution. Therefore, the Court rejects the Petitioners' argument that the current language of SSB 2024-1525 is unconstitutional.

THEREFORE, IT IS ORDERED:

The Petitioners' claims are DENIED, and the constitutionality of SSB 2024-1525 is upheld.

It is so ordered.

KENDRICK, J., MCCLAY, J., POTTHAST, J., and MILLER, J., concurring.

Exhibit 9O: Supreme Court maintains constitutionality of at-Large map by denying discrimination claims in 2024 case '*Fall 2024 Election Map Case*'

https://sg.ufl.edu/wp-content/uploads/2025/10/Supreme-Court-Reporter-Volume-4-update-Mar2025.pdf

UNIVERSITY OF FLORIDA SUPREME COURT
Heard and Decided September 30, 2024

In re Fall 2024 Election Map Case

Miller, J. delivers the opinion of the Court.

Petitioner, Alfredo Ortiz, brings before this Court a claim challenging the constitutionality of the Fall 2024 Election Map. Petitioner asks the Court to interpret Article I, Section 4, as well as Article III, Sections 2(a) and 3 of the University of Florida Student Body Constitution ("UF Constitution") in determining the constitutionality of Student Senate Bill (SSB) 2024-1525, entitled "Fall 2024 Senate Reapportionment Act." Petitioner argues that SSB 2024-1525 is unconstitutional on account of voter dilution by "discriminat[ing] against political minorities."

I. JURISDICTION

This Court has jurisdiction under Article V, Section 3(b)(1) of the UF Constitution, which provides the Supreme Court with authority to "interpret any provision of the constitution or any law" upon written petition of twenty members of the Student Body or request of the Student Body President. Petitioner has provided written petition of twenty members of the Student Body.

II. BACKGROUND

On July 30, 2024, the University of Florida Student Senate passed Student Senate Bill 2024-1525, entitled "Fall 2024 Senate Reapportionment Act". The Bill has since then been signed into law and is currently in effect.

SSB 2024-1525 and its Fall 2024 Election Map reapportioned both on-campus and off-campus Senate seats. Petitioner specifically takes issue with the off-campus reapportionment, and the creation of what he claims is an "at-large" off-campus apportionment. SSB 2024-1525 removes reference to the prior alphabetized off-campus Districts and to geographic locations through ZIP codes and apportions thirty-seven off-campus Senate seats to represent students living off-campus.

Petitioner argues that SSB 2024-1525 is unconstitutional because the resulting Fall 2024 Election map "discriminate[s] against political minorities by diluting their vote." Petitioner points to Article I, Section 4 of the UF Constitution, which provides that "Student Government nor any organization that receives funds shall not discriminate on the basis of race, creed, color, religion, age, disability, sex, sexual orientation, gender identity and expression, marital status, national origin, political opinions or affiliations, veteran status or any other classification as provided by law." The Petitioner does not ask the Court to adopt any remedial map.

III. ANALYSIS

The central question before the Court is whether SSB 2024-1525, entitled "Fall 2024 Senate Reapportionment Act," is constitutional under the UF Constitution, specifically under the Anti-Discrimination Clause in Article I, Section 4, and in light of Article III, Sections 2(a) and 3.

A. Article I, Section 4: The Anti-Discrimination Clause

Petitioner's primary argument is that SSB 2024-1525 results in unconstitutional voter dilution. Petitioner specifically points to District D, claiming that "political minorities have overwhelmingly won the majority of District D" since 2017.

To establish a claim of voter dilution, three conditions must be met. It requires a petitioner to show that: "(1) a minority population is 'sufficiently large and geographically compact to constitute a majority in a single-member district'; (2) the minority population is 'politically cohesive'; and (3) the majority population 'votes sufficiently as a bloc to enable it . . . usually to defeat the minority's preferred candidate.'" *In re Senate Joint Resol. of Legis. Apportionment 1176*, 83 So. 3d 597, 622 (Fla. 2012) (quoting *Thornburg v. Gingles*, 478 U.S. 30, 50–51 (1986)).

i. Student Government Politics

Petitioner points to Article I, Section 4 of the UF Constitution, which states that "Student Government nor any organization that receives funds shall not discriminate on the basis of race, creed, color, religion, age, disability, sex, sexual orientation, gender identity and expression, marital status, national origin, *political opinions or affiliations*, veteran status or any other classification as provided by law." (emphasis added).

Petitioner argues that the language "political opinions or affiliations" includes University of Florida Student Government political opinions or affiliations, and not merely formal political affiliation in state and federal elections. Petitioner points to Article VIII, Section 3(a)(2) to lend support to his argument. Article VIII, Section 3(a)(2) provides guidance for the composition of a constitutional revision commission in the context of proposing amendments to the UF Constitution. Petitioner points to the inclusion of the phrases "minority party" and "independently affiliated" to argue that the UF Constitution considers University of Florida Student Government politics, and thus, that the anti-discrimination clause of Article I, Section 4 includes such politics.

The Court is compelled by Petitioner's argument that the UF Constitution's anti-discrimination clause of Article I, Section 4 may indeed include Student Government political opinions and affiliations. However, even in light of this, Petitioner has failed to sufficiently prove a claim of voter dilution because he has failed to show that a politically cohesive minority party has faced any such discrimination.

ii. Voter Dilution Claim

Petitioner continually refers to the dilution of the votes of "political minorities" and the "minority party." Petitioner has asked the Court to focus on District D (ZIP code 32608); he claims that since 2017, "political minorities have overwhelmingly won the majority of District D," with the exception of the 2020 election during the COVID-19 pandemic. Petitioner specifically notes that of the 87 representatives that have been elected to represent District D since 2017, only 15 have been affiliated with "the majority." Discounting the election during the COVID-19 pandemic—where voter turnout was nearly 70% less than the average since 2017—only 5 senators were affiliated with the majority.

Petitioner compared the seats won by the "dominant minority party" prior to the new off-campus apportionment with the lack of representation after the new apportionment, arguing that "[s]ince it is a region traditionally won by the minority party, District D residents should have secured at least 5 of the 50 seats representing students based on regional population." Petitioner argues that the new off-campus apportionment has "submerged this historically minority-affiliated district by merging it with historically majority-affiliated districts, effectively diluting its representation." Petitioner has also provided years' worth of election results to support his claim.

The glaring problem with Petitioner's argument is that there is no cohesive minority political opinion or affiliation being diluted.

As previously stated, to establish a voter dilution claim, a petitioner must show that "a minority population is 'sufficiently large and geographically compact to constitute a majority in a single-member district'" and that "the minority population is 'politically cohesive.'" *In re Senate Joint Resol. of Legis. Apportionment 1176*, 83 So. 3d 597, 622 (Fla. 2012) (quoting *Thornburg v. Gingles*, 478 U.S. 30, 50–51 (1986)).

1. Political Affiliation

In this case, we have no "politically cohesive" minority population and clearly no continuous presence of a particular "political affiliation" that is being diluted. The University of Florida Student Government political parties have continually changed over time and have done so rapidly. In the District at issue, over the years Petitioner asks us to consider, the political party in the minority has not been consistent or cohesive. A minority party, Inspire Party, only won the majority of District D seats in three fall elections, in 2017, 2018, and 2019. A separate and distinct minority party, Change Party, only won the majority of District D seats in two fall elections, in 2021 and 2022. Only three elections with a consistent minority political party are *hardly* enough to establish a strong, historical precedent deserving of strict protection. Thus, Petitioner has failed to prove that there is discrimination against any "political affiliation."

2. Political Opinion

Petitioner's stronger argument is that a "political opinion" is the subject of the voter dilution. However, an anti-majoritarian sentiment, while arguably consistent, is not representative of any "politically cohesive" group. Voters who vote against the majority consistently may do so for wildly different reasons—or for no reason at all. Being united by an anti-majoritarian sentiment alone is not enough, and even if it were, there is not a scintilla of evidence to establish that there is any shared belief or sentiment across this allegedly united group of voters. In fact, it would be impossible to vote based upon a counter-majoritarian outlook even if it were a cognizable political opinion, because no individual is truly aware when casting their vote whether their vote ends up being in the majority or minority.

Petitioner himself stated during the Hearing that "it's not about allegiance to any minority." Unfortunately, that is precisely why his argument fails. It is too dangerous for this Court to broadly construe the phrase "political opinion" to include an unknown, unnamed sentiment that is anti-majority. This would render "political opinion" entirely unmeasurable and ambiguous and could likely yield arbitrary results in the future. Petitioner is asking the Court to make the dangerous assumption that different political minorities with different platforms, names,

members, and brands are one "politically cohesive" minority group. This is unrealistic and far beyond what the anti-discrimination clause of Article I, Section 4 of the UF Constitution asks us or allows us to do.

The Court should be weary of wading into policy-related waters. By ruling for Petitioner, we would be effectively designating the result of an election, or the numerical comparison to a different political party, as a "political opinion." Consistently non-majority is simply not a political opinion—it is a result.

In addition, the Court hears Petitioner's claim that ruling in his favor may result in "extraordinary constitutional circumstances" if the Senate were unable to pass a new map in time for the Fall election. This potential plays no role in the Court's decision today, which is fully grounded in the constitutionality of the Student Senate Bill at issue.

B. Article III, Sections 2(a) and 3

Petitioner also asks the Court in his request for relief to interpret Article III, Sections 2(a) and 3 in determining the constitutionality of SSB 2024-1525. These sections, dealing with the composition and apportionment of the Student Senate are not relevant to Petitioner's voter dilution claim, and he does not expand upon their relevance outside of establishing jurisdiction and his request for relief.

Article III, Section 2(a) of the UF Constitution reads that "Forty to sixty members elected in the fall general election as apportioned by law from on-campus area governments as defined by law and from off-campus areas as defined by law. The Student Senate shall apportion senate seats on the basis of population as nearly equal as practicable, provided that each on-campus area government as defined by law shall receive a minimum of one seat, and all family housing residences together shall receive a minimum of one seat."

For the reasons stated concurrently in *Stephens et al. v. University of Florida Student Government* (September 30, 2024), SSB 2024-1525 is constitutional under the Court's interpretation of Article III, Section 2(a).

IV. CONCLUSION

THEREFORE, the Court finds that SSB 2024-1525, entitled "Fall 2024 Senate Reapportionment Act" is constitutional under Article I, Section 4 and Article III, Sections 2(a) and 3 of the UF Constitution.

Petitioner has failed to successfully prove a claim of voter dilution as there is no conclusive evidence demonstrating that a particular, politically cohesive minority group will have its vote diluted by the map's reapportionment of Senate seats.

The Court strongly agrees with Petitioner's argument that reapportionment should never be intended to drown out certain voices or certain political opinions. While the Court is sympathetic to Petitioner's argument that a redistricting of a continually anti-majoritarian district may be somewhat suspect, the Petitioner should seek other avenues outside of the neutral judiciary to right such perceived wrongs, such as via a Voter Referendum or through the political

branches. The Court is tasked only with the question of constitutionality under the UF Constitution.

Accordingly, the Court holds that SSB 2024-1525 is constitutional under Article I, Section 4, and Article III, Sections 2(a) and 3 of the UF Constitution.

It is so ordered.

DEAS, C.J., MCCLAY, J., KENDRICK, J., and POTTHAST, J. concurring.

Exhibit 9P: Fall 2024 election results where the FBK-backed Vision Party won every off-campus seat under the at-Large, off-campus district model

https://sg.ufl.edu/wp-content/uploads/2025/10/Fall-2020-2029-2.pdf

Off Campus Senator - 37 seats

✔ Caroline Botts	✔ Vision Party	4256 - 2.17% (2 votes from absentee ballots)
✔ Nicole Giggliotti	✔ Vision Party	4213 - 2.15% (2 votes from absentee ballots)
✔ Jordan Antevy	✔ Vision Party	4212 - 2.15% (2 votes from absentee ballots)
✔ Danielle Collins	✔ Vision Party	4210 - 2.15% (2 votes from absentee ballots)
✔ Emma Fullerton	✔ Vision Party	4203 - 2.14% (2 votes from absentee ballots)
✔ Matthew Bravo	✔ Vision Party	4202 - 2.14% (2 votes from absentee ballots)
✔ Jocelyn Riley	✔ Vision Party	4190 - 2.14% (2 votes from absentee ballots)

✔ Kate Frinfrock	✔ Vision Party	4180 - 2.13% (2 votes from absentee ballots)
✔ Julia Seifer	✔ Vision Party	4177 - 2.13% (2 votes from absentee ballots)
✔ Maya Idiculla	✔ Vision Party	4173 - 2.13% (2 votes from absentee ballots)
✔ Sara Rodriguez	✔ Vision Party	4156 - 2.12% (2 votes from absentee ballots)
✔ Ava Rathet	✔ Vision Party	4155 - 2.12% (2 votes from absentee ballots)
✔ Maddie Seifer	✔ Vision Party	4154 - 2.12% (2 votes from absentee ballots)
✔ Gabriela Prieto	✔ Vision Party	4149 - 2.12% (2 votes from absentee ballots)
✔ Keegan Dunnam	✔ Vision Party	4146 - 2.11% (2 votes from absentee ballots)

✔ Caleb Archelus	✔ Vision Party	4136 - 2.11% (2 votes from absentee ballots)
✔ Catherine Isakson	✔ Vision Party	4134 - 2.11% (2 votes from absentee ballots)
✔ Emma Jabbour	✔ Vision Party	4124 - 2.1% (2 votes from absentee ballots)
✔ Aleah Henley	✔ Vision Party	4112 - 2.1% (2 votes from absentee ballots)
✔ Jordan Levitt	✔ Vision Party	4108 - 2.09% (2 votes from absentee ballots)
✔ Mia Filoramo	✔ Vision Party	4098 - 2.09% (2 votes from absentee ballots)

✔ Jack Gregg	✔ Vision Party	4088 - 2.08% (2 votes from absentee ballots)
✔ Blake Cox	✔ Vision Party	4087 - 2.08% (2 votes from absentee ballots)
✔ Mackenzie Jarrell	✔ Vision Party	4081 - 2.08% (2 votes from absentee ballots)
✔ Freddi Rappoport	✔ Vision Party	4066 - 2.07% (2 votes from absentee ballots)
✔ Alexa Trower	✔ Vision Party	4045 - 2.06% (2 votes from absentee ballots)
✔ Anthony Boullosa	✔ Vision Party	4035 - 2.06% (2 votes from absentee ballots)
✔ Anjali Sethi	✔ Vision Party	4001 - 2.04% (2 votes from absentee ballots)
✔ Marian Enriquez	✔ Vision Party	3999 - 2.04% (2 votes from absentee ballots)
✔ Aditi Sarkar	✔ Vision Party	3988 - 2.03% (2 votes from absentee ballots)
✔ Rafeh Khan	✔ Vision Party	3981 - 2.03% (2 votes from absentee ballots)
		3974 - 2.03%

✔ Anjani Sharma	✔ Vision Party	3974 - 2.03% (2 votes from absentee ballots)
✔ Frank Quattrocchi	✔ Vision Party	3949 - 2.01% (2 votes from absentee ballots)
✔ Aaron Rubaii	✔ Vision Party	3941 - 2.01% (2 votes from absentee ballots)
✔ Rasika Sriram	✔ Vision Party	3928 - 2% (2 votes from absentee ballots)

✔ Josh Yaciuk	✔ Vision Party	3908 - 1.99% (2 votes from absentee ballots)
✔ David Stevens	✔ Vision Party	3902 - 1.99% (2 votes from absentee ballots)
Emily Rodriguez	Change Party	1272 - 0.65% (6 votes from absentee ballots)
Hana Ali	Change Party	1258 - 0.64% (7 votes from absentee ballots)
Carlos Alemany	Change Party	1239 - 0.63% (7 votes from absentee ballots)
Zoe Richter	Change Party	1226 - 0.63% (6 votes from absentee ballots)
Angela Hoyle	Change Party	1213 - 0.62% (6 votes from absentee ballots)
Melina Nguyen	Change Party	1213 - 0.62% (7 votes from absentee ballots)
Trinity Matve	Change Party	1208 - 0.62% (6 votes from absentee ballots)
Mahisha Murali	Change Party	1205 - 0.61%

Amber Marthinsen	Change Party	1198 - 0.61% (6 votes from absentee ballots)	
Prashanth Perumal	Change Party	1197 - 0.61% (7 votes from absentee ballots)	
Benjamin Blatt	Change Party	1194 - 0.61% (6 votes from absentee ballots)	
Hanna Louth	Change Party	1192 - 0.61% (6 votes from absentee ballots)	
Alexander Peterson	Change Party	1191 - 0.61%	

		(6 votes from absentee ballots)	
Rebecca Payan	Change Party	1184 - 0.6% (6 votes from absentee ballots)	
Mrithika Senthilnathan	Change Party	1177 - 0.6% (7 votes from absentee ballots)	
Tai Nawaz	Change Party	1167 - 0.59% (6 votes from absentee ballots)	
Ryan Aouad	Change Party	1164 - 0.59% (7 votes from absentee ballots)	
Balakumar Viswanathan	Change Party	1164 - 0.59% (7 votes from absentee ballots)	
Raymond Castillo	Change Party	1158 - 0.59% (6 votes from absentee ballots)	
Ethan Centeno	Change Party	1157 - 0.59% (6 votes from absentee ballots)	
Melia Ogle	Change Party	1148 - 0.59% (7 votes from absentee ballots)	
Nathan McGinnis	Change Party	1145 - 0.58% (6 votes from absentee ballots)	
Michael Lim	Change Party	1144 - 0.58% (6 votes from absentee ballots)	
Manuel Marmol	Change Party	1144 - 0.58% (6 votes from absentee ballots)	

Karin Rashid	Change Party	1144 - 0.58% (7 votes from absentee ballots)	
Mahi Hossain	Change Party	1143 - 0.58%	
Nathan Tran	Change Party	1134 - 0.58% (6 votes from absentee ballots)	

Jonathan Chance Stephens	Change Party	1129 - 0.58% (6 votes from absentee ballots)	
Jeff John	Change Party	1126 - 0.57% (7 votes from absentee ballots)	
Nathaniel Pelton	Change Party	1125 - 0.57% (6 votes from absentee ballots)	
Gregory Nobleza	Change Party	1120 - 0.57% (7 votes from absentee ballots)	
Temima Nuzhat	Change Party	1120 - 0.57% (7 votes from absentee ballots)	
Ammar Mansuri	Change Party	1118 - 0.57% (6 votes from absentee ballots)	
Bilal Khokhar	Change Party	1108 - 0.56% (6 votes from absentee ballots)	
Rob Sleiti	Change Party	1105 - 0.56% (6 votes from absentee ballots)	
Ehren Towle	Change Party	1099 - 0.56% (6 votes from absentee ballots)	
Bryan Bromfield	Watch Party	204 - 0.1% (1 votes from absentee ballots)	
Jordan Hall	Watch Party	181 - 0.09% (1 votes from absentee ballots)	
Robert Diaz	Watch Party	173 - 0.09% (1 votes from absentee ballots)	
Kai Steckley	Watch Party	159 - 0.08% (1 votes from absentee ballots)	
Jose Colina	Watch Party	144 - 0.07%	

10/14/24, 9:18 PM		Results	
Beckham Danger Tripp	Watch Party	144 - 0.07% (1 votes from absentee ballots)	
Alfredo Ortiz	Watch Party	138 - 0.07% (1 votes from absentee ballots)	
William Glynn	Watch Party	124 - 0.06% (1 votes from absentee ballots)	
Pierce Garvis	Watch Party	121 - 0.06% (1 votes from absentee ballots)	
Cheton Shinde	Watch Party	120 - 0.06% (1 votes from absentee ballots)	
Carlos Salazar	Watch Party	119 - 0.06% (1 votes from absentee ballots)	
Brenden Grau	Watch Party	110 - 0.06% (1 votes from absentee ballots)	
Ajzy Pooran	Watch Party	104 - 0.05% (1 votes from absentee ballots)	
Joshua Riehm	Watch Party	104 - 0.05% (1 votes from absentee ballots)	
Gavin Schwanke	Watch Party	102 - 0.05% (1 votes from absentee ballots)	
Seamus Hinz	Watch Party	98 - 0.05% (1 votes from absentee ballots)	
408 losing write-in candidates with 519 votes			

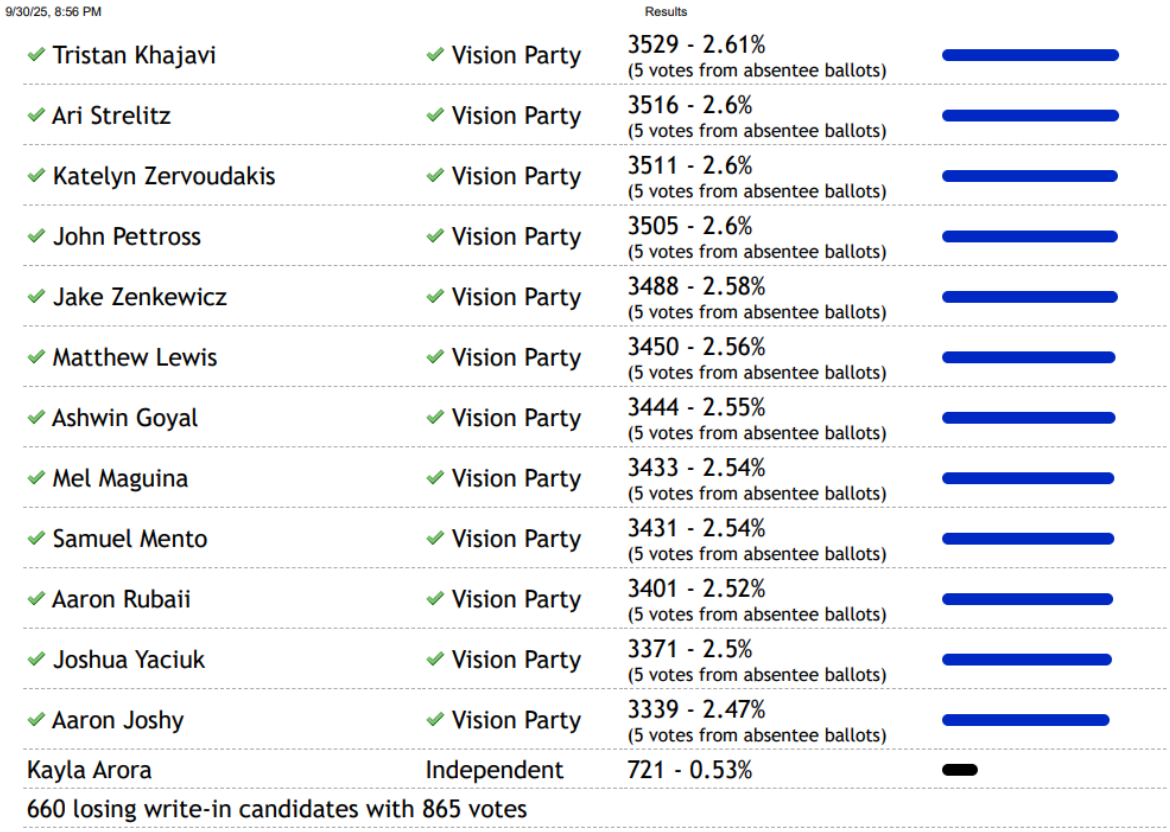
Exhibit 9Q: Fall 2025 election results where the FBK-backed Vision Party won every off-campus seat under the at-Large, off-campus district model

https://sg.ufl.edu/wp-content/uploads/2025/10/Fall-2020-2029-2.pdf

Off Campus Senator - 37 seats

✔ Ava Avera	✔ Vision Party	3977 - 2.95% (5 votes from absentee ballots)	
✔ Matthew Milton Bravo	✔ Vision Party	3956 - 2.93% (5 votes from absentee ballots)	
✔ Logan Alexander	✔ Vision Party	3875 - 2.87% (5 votes from absentee ballots)	
✔ Kate Finfrock	✔ Vision Party	3867 - 2.86% (5 votes from absentee ballots)	
✔ Ella Martin	✔ Vision Party	3758 - 2.78% (5 votes from absentee ballots)	
✔ Caroline Kim	✔ Vision Party	3753 - 2.78% (5 votes from absentee ballots)	
✔ Emma Ramsey	✔ Vision Party	3745 - 2.77% (5 votes from absentee ballots)	
✔ Emma Stein	✔ Vision Party	3735 - 2.77% (5 votes from absentee ballots)	
✔ Ari Meyerowitz	✔ Vision Party	3725 - 2.76% (5 votes from absentee ballots)	
✔ Molly Murphy	✔ Vision Party	3716 - 2.75% (5 votes from absentee ballots)	
✔ Taylor Dees	✔ Vision Party	3687 - 2.73% (5 votes from absentee ballots)	

✔ Maya Sakellarios	✔ Vision Party	3686 - 2.73% (5 votes from absentee ballots)
✔ Preston Levy	✔ Vision Party	3643 - 2.7% (5 votes from absentee ballots)
✔ Maya Idiculla	✔ Vision Party	3626 - 2.69% (5 votes from absentee ballots)
✔ Lexie Trower	✔ Vision Party	3625 - 2.69% (5 votes from absentee ballots)
✔ Drew Lanier	✔ Vision Party	3603 - 2.67% (5 votes from absentee ballots)
✔ Michael O'Malley	✔ Vision Party	3584 - 2.66% (5 votes from absentee ballots)
✔ Joshua Orsey	✔ Vision Party	3573 - 2.65% (5 votes from absentee ballots)
✔ Abigail Melamed	✔ Vision Party	3565 - 2.64% (5 votes from absentee ballots)
✔ Dylan Cannella	✔ Vision Party	3559 - 2.64% (5 votes from absentee ballots)
✔ Mandy Liu	✔ Vision Party	3558 - 2.64% (5 votes from absentee ballots)
✔ Maverick Epstein	✔ Vision Party	3556 - 2.63% (5 votes from absentee ballots)
✔ Anthony Boullosa	✔ Vision Party	3539 - 2.62% (5 votes from absentee ballots)
✔ Zoe Metchick	✔ Vision Party	3536 - 2.62% (5 votes from absentee ballots)
✔ Cooper Dotson	✔ Vision Party	3533 - 2.62% (5 votes from absentee ballots)



9/30/25, 8:56 PM		Results
✔ Tristan Khajavi	✔ Vision Party	3529 - 2.61% (5 votes from absentee ballots)
✔ Ari Strelitz	✔ Vision Party	3516 - 2.6% (5 votes from absentee ballots)
✔ Katelyn Zervoudakis	✔ Vision Party	3511 - 2.6% (5 votes from absentee ballots)
✔ John Pettross	✔ Vision Party	3505 - 2.6% (5 votes from absentee ballots)
✔ Jake Zenkewicz	✔ Vision Party	3488 - 2.58% (5 votes from absentee ballots)
✔ Matthew Lewis	✔ Vision Party	3450 - 2.56% (5 votes from absentee ballots)
✔ Ashwin Goyal	✔ Vision Party	3444 - 2.55% (5 votes from absentee ballots)
✔ Mel Maguina	✔ Vision Party	3433 - 2.54% (5 votes from absentee ballots)
✔ Samuel Mento	✔ Vision Party	3431 - 2.54% (5 votes from absentee ballots)
✔ Aaron Rubaii	✔ Vision Party	3401 - 2.52% (5 votes from absentee ballots)
✔ Joshua Yaciuk	✔ Vision Party	3371 - 2.5% (5 votes from absentee ballots)
✔ Aaron Joshy	✔ Vision Party	3339 - 2.47% (5 votes from absentee ballots)
Kayla Arora	Independent	721 - 0.53%
660 losing write-in candidates with 865 votes		

Exhibit 9R: A series of audiovisual recordings uploaded by UFSG-SPAN of the Vision-controlled Judiciary Committee passing Student Senate Bill 2025-1209: Reapportionment Act Fall 2026 that continues the at-Large, off-campus district's existence under the same rationale that a lack of data from the Registrar's Office has justified its creation

Video 1: https://youtu.be/6yTr9v4bghE?si=u62ju0pPW_wI4U35
Video 2: https://youtu.be/-hNpuUIv-e4?si=9oVyUok3rIqMr08a
Video 3: https://youtu.be/SkYSscubE-4?si=bUosT8eDzkl6VJjz
Video 4: https://youtu.be/fINSkFbO2S8?si=vVMhhEJACiPxHU-_
Video 5: https://youtu.be/3Nm_dHe8um0?si=tktwc8NOvDUqvREK

Exhibit 9S: PRR'd official presentation by the Judiciary Chair of the Registrar's Office Data for Spring 2026 and Fall 2026, shows a clear deficit in the amount of off-campus students living in Alachua County based on the zip codes from their reported address on One.UF

FALL 2026 REAPPORTIONMENT

JUDICIARY CHAIR MELAMED

Graham needs to go off-campus as defined by the Student Body Constitution Article 3 Section 2 (a)

Section 2 Composition.—The Student Senate shall be composed of:

(a) FALL CLASS.—Forty to sixty members elected in the fall general election as apportioned by law from on-campus area governments as defined by law and from off-campus areas as defined by law. The Student Senate shall apportion senate seats on the basis of population as nearly equal as practicable, provided that each on-campus area government as defined by law shall receive a minimum of one seat, and all family housing residences together shall receive a minimum of one seat. Transferring from a living area, except when the transfer is unavoidable by the temporary closing of a student senator's residence, shall constitute de jure resignation. The transfer prohibition shall not be effective from the end of the spring academic term until the fall general election.

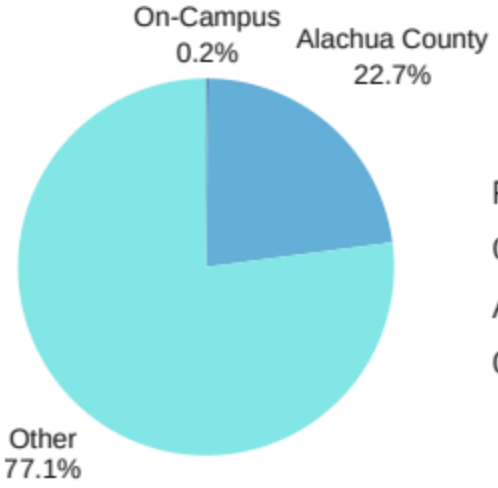
322.2 On-campus shall be defined as University of Florida residence halls and graduate and family housing controlled by the Department of Housing and Residence Life.

322.21 All on-campus residents will elect Student Senators by districts based upon where they physically reside while attending the University of Florida. On-campus districts shall be apportioned as follows:

Beaty Towers..... 1
Broward-Rawlings Area.....1
Graduate and Family Housing.....1
~~Graham Area.....1~~
Honors Village.....1
Hume Area.....1
Infinity Hall.....1
Jennings Area..... 1
Keys-Springs Residential Complexes..... 1
Lakeside Residential Complex.....1
Murphree Area.....1
Tolbert Area..... 1
Yulee Area.....1

322.3 Off-campus shall be defined as all areas not included in residence areas listed in Section 322.2, S.B.S.

FALL 2025 DATA



Registered UF Students:	63,138
On- Campus Students:	131
Alachua County Students:	14,336
Other locations:	48,671

Students in Alachua (**14,467**) - Dorm Students (**131**) = **14,336**

14,336 / Total Registered Students (**63,138**) = **0.227**

.227 x 38 Off Campus Seats = 8.626 = 8 Seats

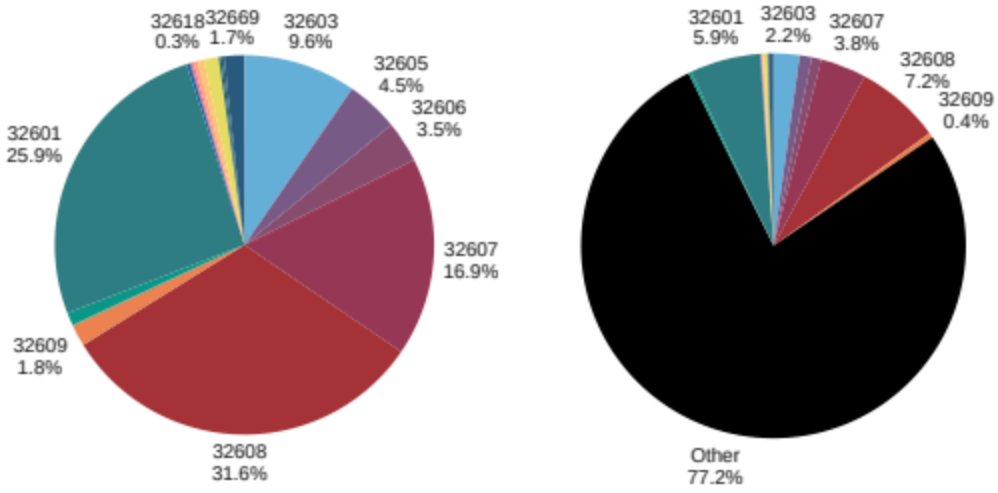
22.7 %

UF Students in Alachua County
8 Senate Seats

77.3 %

UF Students Outside of Alachua
30 Senate Seats

Side by Side Comparison



CHAIR RECOMMENDATION: 38 OFF CAMPUS SEATS

Exhibit 9T: Vision-controlled Judiciary Committee passes Student Senate Bill 2025-1209: Reapportionment Act Fall 2026, signed by Vision-aligned Senate President Maya Idiculla and Student Body President Blake Cox

UF UNIVERSITY of FLORIDA
Student Senate

3000 J. Wayne Reitz Union
PO Box 118505
Gainesville, FL 32611
352-392-1665

STUDENT SENATE BILL 2025-1209

TITLE: Reapportionment Act Fall 2026

AUTHOR(S): The Judiciary Committee

SPONSOR(S):

CHAPTER 322 APPORTIONMENT (67-107, 72-118, 72-172, 72-183, 75-184, 77-123, 79-127, 80-180,81-142, 82-147, 83-176, 84-104, 84-149, 87-150, 87-156, 87-164, 88-122, 89-122, 90-124, 90-149, 91-107, 91-131, 92-105, 92-129, 94-114, 94-115, 94-122, 95-121, 96-107, 96-130, 97- 134, 98-102, 98-118, 99-101, 99-123, 2000-133, 2001-129, 2002-147, 2004-127, 2004-128, 2005- 126, 2005-129, 2005-132, 2005-143, 2007-140, 2007-143, 2008-110, 2008-141, 2009-124, 2010- 114, 2011-124, 2011-125, 2012-112, 2013-113. 2014-116, 2014-117, 2015-109, 2016-118, 2016- 119, 2017-111, 2017-112, 2018-121, 2018-122, 2019-1092, 2019-1093, 2020-1022, 2020-1056, 2021-117, 2022-113, 2024-100, 2024-194, 2024-199).

322.2 On-campus shall be defined as University of Florida residence halls and graduate and family housing controlled by the Department of Housing and Residence Life.

322.21 All on-campus residents will elect Student Senators by districts based upon where they physically reside while attending the University of Florida. On-campus districts shall be apportioned as follows:

Beaty Towers..... 1
Broward-Rawlings Area.....1
Graduate and Family Housing.....1
~~Graham Area.....1~~
Honors Village.....1
Hume Area.....1
Infinity Hall.....1
Jennings Area..... 1
Keys-Springs Residential Complexes..... 1
Lakeside Residential Complex.....1
Murphree Area.....1
Tolbert Area..... 1
Yulee Area.....1

322.3 Off-campus shall be defined as all areas not included in residence areas listed in Section 322.2, S.B.S.

322.31 All off-campus residents will elect Senators based upon where they physically reside while attending the University of Florida. Off-campus shall be apportioned as follows:

Off Campus.....~~XX~~ 38

322.31 Off-campus Student Senate seats shall be identified by a number designated after each Fall election by alphabetical order. The appointment or selection of replacement Student Senators shall not alter Student Senate seat designations. This is for the purpose of identification and management.

Maya Idiculla 12/3/25
Maya Idiculla Date
Senate President

Blake Cox 12/3/25
Blake Cox Date
Student Body President

12/3/25
Date Sent to VPSL Office
Will be enacted if not vetoed within 10 days

An Equal Opportunity Institution 2025-1209

- **SET 10: The Supreme Court under Chief Justice Hagen Turner has violated the Supreme Court Rules and Procedures to not have oral hearings or properly respond to filings after 14 days on cases that question the constitutionality of the at-Large, off-campus district (Exhibit 10A-10D)**

The final set of exhibits alleges that the Supreme Court, under Chief Justice Turner, has **violated its own Rules and Procedures** to avoid reviewing the constitutionality of the at-Large map. The Court is accused of reinterpreting rules to **deny mandatory oral hearings**. These procedural

maneuvers are alleged to be intentional efforts to stall accountability and protect the Vision-FBK money stream.

Exhibit 10A: Supreme Court refuses to exercise judicial review on the constitutionality of Student Body Statute 322.51 with the Anti-Discrimination Clause in the Student Body Constitution

UNIVERSITY OF FLORIDA SUPREME COURT
Decided November 16, 2025

In re Interpretation of Student Body Statute 322.51's Constitutionality Under Article I, Section 4

GERKEN, J. delivers the opinion of the Court.

The Petitioners request that the Court interpret Student Body Statute 322.51 for the purpose of assessing whether it is constitutional under the Anti-Discrimination Clause, as set forth in Article I, Section 4 of the Student Body Constitution.

Jurisdiction and Standing

The Petitioners seek jurisdiction under Article V, Section 3(b)(1) of the Student Body Constitution, which provides that the Supreme Court "shall interpret any provision of the constitution or any law" upon the written petition of twenty members of the Studeny Body or the request of the Student Body President. Here, the Petitioners request an interpretation of Student Body Statute 322.51.

Statute 322.51 is clear on its face. It affords the Student Senate the ability to determine proper apportionment with the assistance of the Supervisor of Elections and the population data provided by the Registrar's Office. Petitioner requests that the Court declare Student Body Statute 322.51 unconstitutional under the Anti-Discrimination Clause in Article I, Section 4 of the Constitution. The relief requested is not within the scope of Section 3(b)(1).

Conclusion

THEREFORE, this Court holds it lacks jurisdiction to proceed further with this matter. Accordingly, the petition is DISMISSED.

It is so ordered.

TURNER, C.J., POTTHAST, J., MILLER, J., and DEL TORO, J., concurring.

Exhibit 10B: Supreme Court rejects motion of recusal by reinterpreting 'response' in Rule 7.4 to be the initial email response to case submission instead of the final judgment

Chief Justice of the Student Body
To: Sklar, Tyler A.
Cc: Supreme Court Justice 3 - Adeline Gerken; **+3 others**
Wed 1/21/2026 7:53 PM

You replied on Thu 1/22/2026 12:41 PM

Tyler,

As stated in your email, Rule 7.4 states "The Court will respond to all petitions submitted no later than 14 days after receipt of the petition." Considering the petition was recieved on 11/19/2025 at 1:12 AM and responded to on 11/19/2025 at 10:41 AM, the requirement of Rule 7.4 has been met.

We will get to your case soon.

Thanks,

Hagen Turner

Exhibit 10C: Motions of recusal from Jordan Hall and Andrew Larsen due to lack of oral hearings held by the Supreme Court for multiple cases as per Rule 4.1

From: Larsen, Andrew D.
Sent: Tuesday, December 2, 2025 2:08 PM
To: Chief Justice of the Student Body <chiefjustice@sg.ufl.edu>; Supreme Court Justice 2 - Mark Freeman <justice2@sg.ufl.edu>; Supreme Court Justice 3 - Adeline Gerken <justice3@sg.ufl.edu>; Supreme Court Justice 4 - Angelina Del Toro <justice4@sg.ufl.edu>; Supreme Court Justice 5 - Stephanie Miller <Justice5@sg.ufl.edu>
Subject: Motion to Recuse

I hope this finds you well.

Please consider this a motion for your recusal under Student Body Statute 402.1. ("In any case before the court any party to said cause or any interested party, may at any time before final judgment, file a motion requesting a disqualification of a member of the court.") Rule 4.1 establishes that "The Court will hear oral argument on all cases it does not decline to hear at a preliminary hearing or by email notification to the petitioner."

On November 18, 2025, the Supreme Court granted jurisdiction to the case In re Arbitrary and Capricious Apportionment, but did not schedule a hearing. It did not decline to hear the case at a preliminary hearing or by email notification, so an oral hearing was necessary. Therefore, the judgement decided by the Court on November 18, 2025 is void and the motion to recuse under Student Body Statute 402.1 is proper.

I am thus, with all due respect, requesting that the Court follow its procedure under Rule 6.3. ("In the event that all of the Justices recuse themselves, the Chief Justice will appoint an eligible student to serve as the Acting Chief Justice for the hearing for which the Chief Justice and Associate Justices are recused."). This is in order to ensure proper compliance with the Court's Rules throughout this proceeding.

Thank you,
Andrew Larsen
College of the Arts Senator
University of Florida Student Senate

From: Hall, Jordan A.
Sent: Tuesday, December 2, 2025 2:20:59 PM
To: Chief Justice of the Student Body <chiefjustice@sg.ufl.edu>; Supreme Court Justice 2 - Mark Freeman <justice2@sg.ufl.edu>; Supreme Court Justice 3 - Adeline Gerken <justice3@sg.ufl.edu>; Supreme Court Justice 4 - Angelina Del Toro <justice4@sg.ufl.edu>; Supreme Court Justice 5 - Stephanie Miller <Justice5@sg.ufl.edu>
Cc: marruda@alligator.org <marruda@alligator.org>
Subject: Motion to Recuse

I hope this finds you well.

Please consider this a motion for your recusal under Student Body Statute 402.1. ("In any case before the court any party to said cause or any interested party, may at any time before final judgment, file a motion requesting a disqualification of a member of the court.") Rule 4.1 establishes that "The Court will hear oral argument on all cases it does not decline to hear at a preliminary hearing or by email notification to the petitioner."

On November 16, 2025, the Supreme Court granted jurisdiction to the case In re Interpretation of Student Body Statute 322.51's Constitutionality Under Article I, Section 4, but did not schedule a hearing. It did not decline to hear the case at a preliminary hearing or by email notification, so an oral hearing was necessary. Therefore, the judgment decided by the Court on November 16, 2025, is void and the motion to recuse under Student Body Statute 402.1 is proper.

I am thus, with all due respect, requesting that the Court follow its procedure under Rule 6.3. ("In the event that all of the Justices recuse themselves, the Chief Justice will appoint an eligible student to serve as the Acting Chief Justice for the hearing for which the Chief Justice and Associate Justices are recused."). This is in order to ensure proper compliance with the Court's Rules throughout this proceeding.

Thank you,
Jordan Hall

Exhibit 10D: Supreme Court rejects motions requesting Judicial Qualification by reinterpreting oral hearings in Rule 3.1 to be optional instead of mandatory via Rule 4.1

From: Supreme Court Justice 5 - Stephanie Miller <Justice5@sg.ufl.edu>
Sent: Tuesday, January 27, 2026 10:27 AM
To: Larsen, Andrew D. <andrew.larsen@ufl.edu>; Hall, Jordan A. <halljordan@ufl.edu>
Cc: Jerome Scott II <jerome.scott@ufl.edu>; Chief Justice of the Student Body <chiefjustice@sg.ufl.edu>; Supreme Court Justice 3 - Adeline Gerken <justice3@sg.ufl.edu>; Supreme Court Justice 4 - Angelina Del Toro <justice4@sg.ufl.edu>
Subject: Response to 12/2 Motions to Recuse

Dear Mr. Hall and Mr. Larsen,

I write to respond to the December 2nd, 2025 Motions to Recuse and to clarify the rules and obligations of the University of Florida Supreme Court ("the Court") under the Supreme Court Rules of Practice and Procedure.

The text of Rule 3.1 reads "The Court may hold a public preliminary hearing on all matters submitted to the Court. If the Court determines to hold a preliminary hearing, then the Court will decide whether to hear a case."

The text of Rule 4.1 reads "The Court will hear oral argument on all cases it does not decline to hear at a preliminary hearing or by email notification to the petitioner."

Rule 3.1 provides for the discretionary ability of the Court to hold preliminary hearings on matters submitted to the Court. As indicated by the use of the word "may," the Court retains the sole authority to decide whether to hold a preliminary hearing. Preliminary hearings are therefore optional and not required.

Rule 4 sets forth the procedures for Oral Argument. Rule 4.1 in particular indicates that the Court will hear oral arguments on all cases "it does not decline to hear at a preliminary hearing or by email notification to the petitioner." The Court interprets this to mean that the Court will move forward to oral argument in a case if the Court (1) did not decline to hear the case at preliminary hearing, or (2) did not address the case via email notification to the petitioner.

In the present cases (*In re Interpretation of Student Body Statute 322.51's Constitutionality Under Article I, Section 4* (Nov. 16, 2025); *In re Arbitrary and Capricious Appointment* (Nov. 18, 2025)), we fall into the second category. The Court did address these cases via email notification with the attached decisions on November 16th and November 18th, respectfully. As stated above, a preliminary hearing is entirely discretionary and the Court was not obligated to provide one. Petitioners were not therefore immediately entitled to oral argument due to the lack of "declin[ing] to hear the case at preliminary hearing." Petitioners' current interpretation of Rule 4.1 would make the latter half "or by email notification to the petitioner" superfluous.

The Court recognizes, however, the importance of the student body being heard. The Court also recognizes the great benefit of preliminary hearings and oral arguments to increase the transparency of the judicial process and the legitimacy of the Court. The discretionary nature of the language in Rules 3.1 and 3.4 serves the very purpose of giving the Court the ability to decide when such hearings would further justice. Thus, the Court will strive to increase this transparency going forward as justice so requires. The Court is not meant to be an ivory tower, inaccessible to the students of the University of Florida. The Court strongly expresses the desire and commitment to remain a neutral forum of justice accessible to all students.

The Motions Requesting Judicial Disqualification in Mr. Hall's and Mr. Larsen's cases are both untimely as they were filed after final judgment, as per the language of Student Body Statute 402.1.

Therefore the December 2nd, 2025 Motions Requesting Judicial Disqualification under Student Body Statute 402.1 are DENIED.

Stephanie Miller
Justice5@sg.ufl.edu
Associate Justice | University of Florida Supreme Court

DISCUSSION

This section discusses whether **Senate President Maya Idiculla** and **Chief Justice Hagen Turner**, through their unlawful regard for official behavior, conflicts of interests, and inducing others to act or refrain from acting have violated **Student Body Statutes 101.43, 101.41, and 101.45** with probable cause to require further investigation from the **Commission of Ethics** after a preliminary investigation has been conducted.

Part I-IV sets forth the guidelines for a preliminary investigation in Chapter 101 via Student Body Statutes 101.71 and 101.72 along with various conditions that may result in the recusal of the Rules and Ethics Chairperson. The Petitioners cite Student Body Statute 101.61 to request the recusal of the Rules and Ethics Chairperson due to having a mutual executive-board relationship with the Senate President via the Senate Executive Board. As such, the preliminary investigation would fall on an independent special investigator appointed by the Chief Justice as per Student Body Statute 101.61. However, since the Chief Justice has also been accused in the ethics complaint, they cannot select an independent special investigator as per Student Body Statute 402.1, which requires the disqualification of any interested party or individual before final judgment. The acting Chief Justice who is appointed under Rule 6.1 of the Supreme Court Rules of Practice & Procedure will take their place and assign any eligible student to be the special investigator who will conduct a preliminary investigation to find probable cause.

Part V-VI sets forth the guidelines for the Commission of Ethics when the Chief Justice is under investigation as per Student Body Statute 101.73. Under this statute, the Executive Director/Chancellor of the Honor Court Administration would convene the Commission, which they are authorized power under Student Body Statute 101.731 and 101.732 to preside, sign subpoenas, obtain evidence, testimony under oath, and distribute the written findings to the accused after approval from ten members.

Part VII sets forth evidence from **Set 1-10** demonstrating that structural actions taken by the University of Florida Supreme Court has created, preserved, and reinforced an electoral framework that has materially benefitted the Vision Party and by extension, Florida Blue Key's interests. Collectively, the evidence supports the Petitioners' allegations on Senate President Maya Idiculla and Chief Justice Hagen Turner's unlawful regard for official behavior, inducement to act or refrain from acting, and monetary conflicts of interests in violation of Student Body Statutes 101.43, 101.41, and 101.45 respectively.

Arguments 6.1 through 6.6 are presented sequentially to establish (1) the Supreme Court's role in restructuring Student Government elections for Student Senate seats following a loss of FBK-aligned budgetary control, (2) the Court's refusal to acknowledge or evaluate evidence concerning the System's existence, (3) the Court's reliance on incomplete apportionment data to justify maintaining an at-Large model, and (4) procedural deviations that prevented substantive constitutional review. Together, these actions demonstrate a consistent pattern of behavior in

which judicial discretion was exercised to preserve a political and financial status quo favorable to Vision Party leadership in the Student Senate.

I. Chapter 101 Requires Independent Investigation of Ethics Complaints

Student Body Statute 101.71 requires a preliminary investigation upon a written complaint. Student Body Statute 101.72 supplies a mandatory independence safeguard by requiring that the Rules and Ethics Chairperson or appointed investigator be "independent of ties to the tortfeasor pursuant to 101.61." The statutory scheme therefore conditions legitimacy of the process of independence.

II. The Complaint Alleges Violations of Statutes 101.43, 101.41, 101.45 Requiring Investigation

The Complaint alleges unlawful compensation or corrupt benefit connected to official behavior (Student Body Statute 101.43), conflicts of interest arising from direct or indirect financial interests inconsistent with the best interests of the Student Government (Student Body Statute 101.41), and inducing others to act in violation of Student Body Statute 101.43 (Student Body Statute 101.45). These allegations fall squarely within Chapter 101 and require an independent preliminary investigation.

III. The Rules and Ethics Chairperson Must Be Recused Under Statutes 101.61 and 101.72

Student Body Statute 101.61 prohibits mutual executive-board membership with a person named in the complaint. Because the Rules and Ethics Chairperson is a mutual member of the Senate Executive Board with the Senate President named in the Complaint, the Ethics Chairperson is not independent and must be recused. Student Body Statute 101.72 therefore requires appointment of an independent special investigator to assume the Chair's investigative responsibilities.

IV. The Chief Justice Must Be Disqualified Under Student Body Statute 402.1 Before Any Appointment Under Statute 101.72

Student Body Statute 101.72 contemplates appointment by the Chief Justice; however, Student Body Statute 402.1 requires disqualification where a party or interested person moves prior to final judgment. Petitioners allege the Chief Justice is an interested party and/or accused participant in the underlying conduct. The Chief Justice therefore cannot select the special investigator without violating the core independence purposes of Chapter 101.

V. The Acting Chief Justice, as Appointed Under Rule 6.2 of The Supreme Court Rules of Practice & Procedure, Will Appoint the Special Investigator

The acting Chief Justice who will be an Associate Justice that is appointed by the recused Chief Justice under Rule 6.2 of the Supreme Court Rules of Practice & Procedure. Under Student Body Statute 101.72, the acting Chief Justice will be given the authority to appoint any eligible student to be the special investigator to determine probable cause via a preliminary investigation.

VI. Upon Probable Cause, the Commission on Ethics Must Be Convened Under Student Body Statute 101.73

Upon a showing of probable cause, Student Body Statute 101.73 requires convening of the Commission on Ethics. Where the Chief Justice is the subject of investigation, 101.73 assigns convening authority to the Executive Director/Chancellor of the Honor Code Administration. The Court should therefore order compliance with Student Body Statute 101.73 in the event probable cause is found.

VII. The Commission Must Be Empowered to Obtain Evidence and Issue Written Findings Under Student Body Statutes 101.731 and 101.732

Student Body Statute 101.731 authorizes subpoena power pursuant to section 401.3 to obtain evidence and testimony under oath and requires the convening judicial officer to preside and sign subpoenas. Student BodyStatute 101.732 requires written findings approved by ten members of the Commission and distributed to the accused. These provisions ensure due process and enforceability and should be expressly ordered in the relief.

VIII. Structural Motive and Conflict Evidence

Petitioners further allege that Supreme Court structural actions demonstrate motive and conflicts supporting Charges that violate Student Body Statutes 101.41, 101.43, and 101.45 including:

- **ARGUMENT 6.1:** The Supreme Court's At-Large Map to Restore FBK
- **ARGUMENT 6.2:** Supreme Court Denial of System Existence
- **ARGUMENT 6.3:** Supreme Court Data Excuse
- **ARGUMENT 6.4:** Supreme Court Refusal to Review Data Constitutionality
    - **NOTE:** Anti-Discrimination Clause implications and need for better data collection.
- **ARGUMENT 6.5:** Chief Justice Breaking Rules to Not Review Data Constitutionality
- **ARGUMENT 6.6:** How 6.5 continues the Vision–FBK money stream

6.1: The Supreme Court's implementation of the at-Large Map to Restore Florida Blue Key's dominance in the Student Senate for complete budgetary control through the Vision Party under Senate President Maya Idiculla

Since 2023, the University of Florida Supreme Court has used its judicial powers to implement an at-Large, off-campus district model, replacing the multi-district off-campus model for off-campus seats in the University of Florida Student Senate (**Exhibits 9F, 9H**) The Court had ruled in favor of the at-Large off-campus model over the multi-district off-campus model, deeming it unconstitutional due to lack of apportionment data. (**Exhibits 9H, 9I**) The decision came amid a period of sentiment against the interests of Florida Blue Key (FBK), which resulted in the longstanding indie party, the Change Party, achieving a majority in the Student Senate. (**Exhibits 9A, 9B**) After forcing a compromise between the Change Party and the FBK-backed Gator Party, following the latter's quorum-busting of several Student Senate meetings, the Change Party lost its ability to pass its budgetary agenda to reallocate funding from ACCENT Speakers Bureau and Student Government Productions (SGP) to student organization funds, with subsequent attempts blocked by the Court. (**Exhibits 9C, 9D, 9E, 9G, 9J**)

This new model has effectively implemented a winner-take-all electoral system that has largely benefitted the Vision Party through plurality voting in subsequent elections (**Exhibits 9K, 9P, 9Q**), which is the newest iteration of the System-aligned party backed by FBK. (**Exhibits 5A-5C**) As a result, the Change Party had lost its legislative majority and ceased to function by Fall 2025, while Vision Party won a supermajority of the Student Senate. By ensuring a supermajority in the legislative branch for the System-aligned Student Government political party, the Court has enabled Florida Blue Key's monetary conflict of interest within ACCENT and SGP to continue through their capture of legacy positions, without pushback from the opposition. (**Exhibits 4A-4C**) The Student Senate under Senate President Maya Idiculla of the Vision Party has been able to easily approve executive nominations, including those considered legacy positions from the Vision-controlled executive branch, and pass the annual Activity & Service Fee budget that supports FBK getting thousands of dollars through subsidiaries via Gator Growl and fees for the private talent agency owned and run by FBK members, Greater Talent Network (**Exhibits 4A-4E**) As a whole, the winner-take-all electoral system has enabled the University of Florida Student Government to be in a political condition that is legally classified as **state capture**, a form of systemic political corruption in which private interests have significantly influenced public decision-making within the institution in favor of the private organization at the expense of the public. In this case, the Court has successfully allowed Florida Blue Key to influence the Student Government to serve its own private financial interests at the expense of minority representation in off-campus areas through the at-Large model.

6.2: The Supreme Court's denial of the System's existence as speculative

The University of Florida Supreme Court has taken deliberate and decisive measures to ensure that Florida Blue Key's political machine, which is known as the System, as documented in various court documents (**Exhibits 1A-1F**), publicly circulated academic papers (**Exhibits 2A-2C**), and newspaper articles (**Exhibit 4F**), is not recognized and classified in official Student Government records. In 2025, a Petitioner filed a case under '*In re Political Discrimination and Apportionment Case*', the Court was to recognize the existence of the System and the Independent movement in order to accumulate substantial evidence of voter dilution under the new at-Large model according to the test in the U.S. Supreme Court case Thornburg v. Gingles. (**Exhibit 8E**) Instead of considering the publicly available evidence including a 1998 case where graduate student Charles Grapski had sued Florida Blue Key for defaming him as a child molester after running against their candidates for Student Body President, resulting in a judicial notice that recognized their historical involvement in SG (**Exhibit 1A**), the Court had ruled the terms of 'the System' and 'Indies' as nonsensical and speculatory and dismissed the case with prejudice. (**Exhibit 8E**)

However, the Court's decision to deny the existence of the System as mere speculation and dismiss the case with prejudice was not the result of pure ignorance or negligence, but of deliberate complicity in its continued domination and influence over the judicial branch. As established in the first part of graduate student David Bradshaw's political science master's thesis, the Supreme Court has faced immense pressure from Florida Blue Key leadership and donors to maintain the political status quo favorable to the System-aligned party. The greatest example is when Bradshaw interviewed an Associate Justice anonymously who stated that they had been threatened by an FBK donor who worked in national politics through the Democratic Party to change their ruling on a controversial referendum on the renaming of the J. Wayne Reitz Union building. Such a referendum was supported by the main Indie party at the time, the Students Party. (**Exhibit 8A, 8C**) Furthermore, an interview Bradshaw conducted with former Chief Justice Matt Michel discusses the existence of the System and its current three-bloc alignment. (**Exhibit 8B**) With decisive evidence to conclude the existence of the System from historical documentation from former members of the Court, the decision by the modern Court to deem the existence of the System as speculation is insurmountably unreasonable, demonstrating a conflict of interest between upholding the proper rule of law and maintaining the System's domination and control.

6.3: The Supreme Court's justification of the continued existence of the at-Large map despite concerns over voter dilution and discrimination

Despite various concerns about the at-Large model's constitutionality under the Student Body Constitution, the University of Florida Supreme Court has preserved and reinforced the at-Large,

off-campus model by justifying the lack of apportionment data for a representative multi-district map as its foundational basis. After the Vision-controlled Student Senate Judiciary Committee's Student Senate Bill 2024-1525, which officially codified the at-Large model, was passed by the Student Senate and signed by the Student Body President, the legislation was challenged multiple times in the judiciary over concerns of voter dilution and discrimination (**Exhibits 9L-9M**) The first major case over the 2024 at-Large model was '*Stephens et al. v. University of Florida Student Government*', which resulted in the Court ruling that the case petitioner's evidence of voter dilution of minority party voters was unsubstantial due to the neutrality of the apportionment data from Registrar's Office. Under Student Body Statute 322.51, the data used lacked any information on protected classes under the Anti-Discrimination Clause. (**Exhibit 9N**) The second major case over the 2024 at-Large model was '*Fall 2024 Election Map Case*', which resulted in a similar ruling by the Court where evidence of discrimination was unsubstantial by classifying the term, 'anti-majority,' as a statistic, not a political affiliation while recognizing Student Government political affiliations to possibly be part of political affiliations that are protected by the Anti-Discrimination Clause. (**Exhibit 9O**)

In two apportionment cases, the Supreme Court established a high threshold for students to prove that the at-Large model had discriminated against protected minorities in certain off-campus areas and/or diluted the vote of minority voters. Meanwhile, the Court reiterated the same points made in prior cases in 2023 that the at-Large model was constitutional and the most representative of the Student Body in off-campus areas due to 'the lack of apportionment data' from the Registrar's Office. (**Exhibits 9N-9O**) Instead of treating the institutional flaw in the lackluster apportionment data, resulting in an electoral model that has resulted in multiple cases with claims of voter dilution and discrimination as a clear democratic deficit and alarm for remediation, the Court has relied on said flaw to preserve the existing electoral framework that has largely benefitted the political status quo under the System.

As documented through the initial 1998 Grapski defamation case, the leaked Unite Tapes in 2010, academic papers, and recent articles by the Alligator and independent journalists, when the System has established voter blocs of thousands of Greek life students from fraternities and sororities through strategic use of 'I Voted' stickers, sticker boards, food and alcohol incentives, and even voter coercion, they have created an insurmountable barrier for any political party or independent candidate not backed by FBK to win in the legislature. By combining all off-campus voters, including those aligned with the System, into one district, the System has a tactical advantage in every election to achieve higher turnout through compulsory voting in fraternities and sororities. (**Exhibit 1A-1F, 2A-2C, 3A-3C, 5A-5C, 6A-6B**) By ignoring evidence of the System's existence, asserting the constitutionality of the at-Large map due to lack of apportionment data without proper remediation, and creating a high threshold for students to prove voter dilution and discrimination under the new model, the Court has created an

institutional legal barrier that justifies the democratic deficit and protects the current political condition of the Student Government under the state capture of FBK. Such a barrier ensures that FBK would further its financial interests via ACCENT and SGP at the expense of democratic election integrity or the proper representation of minority political affiliations in the legislature. (**Exhibit 4A-4F**)

6.4: The Supreme Court's refusal to review a case over the constitutionality of apportionment data that lacks information for protected classes under the Anti-Discrimination Clause to prevent voter dilution

In 2025, the University of Florida Supreme Court refused to use its power of judicial review afforded to it by Article V, Section 3(b)(1) of the Student Body Constitution to review the constitutionality of Student Body Statute 322.51. (**Exhibit 10A**) In *Stephens et al. v. University of Florida Student Government* the year prior, the Court ruled that the evidence of voter dilution was unsubstantial due to the neutrality of the apportionment data, which meant that the Registrar's Office did not provide any information on political affiliations, race, gender, and other protected classes as listed under Article I, Section 4 of the Anti-Discrimination Clause. (**Exhibit 9N**) According to a presentation by the Judiciary Committee that was Public Records Requested, the newest batch data they had received from the Registrar's Office in 2025 had severely lacked a sufficient amount of information on where students lived based on zip codes to accurately apportion off-campus seats into multiple districts. The data for zip codes had been collected from the reported address from students on One.UF (**Exhibit 9R**) Only 22.7% of students had reported an address in Alachua County with the other 77.3% reporting zip codes outside the county. As such, the Judiciary Committee suggested the reinforcement of the at-Large, off-campus model to be in line with what little percentages and information they had on students. Crucially, the data had noted that only 131 students had lived in on-campus dorms based on the zip codes from reported addresses despite official sources from the University of Florida stating that all dorms have over 7,500 beds for individual students. (**Exhibits 9R-9S**)

Knowing the scope of data collection flaws that came with the language to collect this specific data from the Registrar's Office under Student Body Statute 322.51, the Petitioners filed a case that directly challenged the apportionment data itself instead of challenging the at-Large model directly. The Petitioners of the case '*In re Interpretation of Student Body Statute 322.51 under Article I, Section 4*' contended that the process of apportioning any off-campus electoral map for the Student Senate was unconstitutional due to the aforementioned neutrality, relying only on zip codes from students. They argued that the failure to include protected classes in the Anti-Discrimination Clause created a fatal flaw in apportionment, in which institutional neutrality would protect any electoral map that evidently diluted the votes or discriminated against protected classes, because this information was unaccounted for by the Student Senate Judiciary Committee. (**Exhibit 9T**) However, instead of reasoning with the Petitioners'

arguments that may have fulfilled the high threshold set by the Court in previous cases of voter dilution and discrimination (**Exhibit 9N-9O**), they narrowed the jurisdiction under Article V, Section(b)(1) to only encompass review of the plain language, rather than the constitutionality of student body law. (**Exhibit 10A**)

As a result of the Court's decision in *In re Interpretation of Student Body Statute 322.51 under Article I, Section 4*, the constitutionality of the at-Large map under the institutional neutrality of apportionment data has been maintained. By refusing to exercise judicial review, the Court has left the Petitioners' concerns about discrimination and voter dilution completely unanswered. In the future, new students are now unsure of how to potentially challenge the electoral maps when genuine cases of discrimination and voter dilution arise due to the new precedent set by the Court. Such acts combined with the previous aforementioned case where the Court ignored publicly available evidence of the System (**Exhibit 8E**) constitute a clear deviation from the original methods of exercising judicial power from the Court in the past since the first case in the Supreme Court Recorder in 2005 in order to protect the new at-Large model, which was implemented previously to ensure the political status quo under Florida Blue Key's political machine has been maintained (**Exhibits 9F-9I**) after a period of political and social unrest against it. (**Exhibits 9A-9B**)

6.5: Chief Justice Hagen Turner breaks Supreme Court Rules of Practice & Procedure to not hold oral hearings over case on the constitutionality of apportionment data

The University of Florida Supreme Court, under sitting Chief Justice Hagen Turner, has violated multiple rules and practices under the Supreme Court Rules of Practice & Procedure to preserve the constitutionality of the at-Large model. Under Rule 4.1 of the Supreme Court Rules of Practice & Procedure, the Court will hear oral argument on all cases it does not decline to hear at a preliminary hearing or by email notification to the petitioner. The Petitioners of *In re Interpretation of Student Body Statute 322.51 under Article I, Section 4* (**Exhibit 10A**) never received any aforementioned email notification or were scheduled for a preliminary hearing for the case. As such, the Petitioners should have been scheduled for an in-person hearing for oral arguments; however, they did not receive any email from the Court after the initial response from the Chief Justice. After two weeks, the Petitioners received the final judgment only in the opinion submitted by an Associate Justice. (**Exhibit 10A**)

The treatment of this case with no scheduled in-person hearings for oral arguments was not an isolated incident, however. It has been a pattern of behavior for the Court under the sitting Chief Justice. In adjacent cases on apportionment, the Court also gave the same treatment of minimal communication and contact before final judgment. One of these cases is '*In re Arbitrary and Capricious Apportionment,*' where a member of the Judiciary Committee unaffiliated with the

Vision Party filed a petition to rule the committee's judgment of Student Senate Bill 2025-1209: Reapportionment Act Fall 2026 that preserved the at-Large model, despite acknowledging the systemic flaws in the data provided by Registrar's Office, to be arbitrary and capricious. (**Exhibits 9S-9T**) The Petitioner in this case utilized precedent in prior cases to hold the Judiciary Committee's review of legislation accountable under the standards set by the Five Criteria in Rule VIII, Section D of the Student Senate Rules and Procedures. To ensure the Court would accurately review the Committee's judgment, the Petitioner submitted a series of audiovisual recordings of the meeting, available on YouTube. (**Exhibit 9S**) The Petitioner did not receive any email from the Court after the initial response from the Chief Justice, and only received the final judgment via an opinion submitted by an Associate Justice. (**Exhibit 10C**) SSB 2025-1209: Reapportionment Act Fall 2026 was subsequently passed by the Vision Party and signed into law by Senate President Maya Idiculla and the Student Body President. (**Exhibit 9S**)

In response to receiving no notification of a scheduled hearing for oral arguments for these cases, the Petitioners filed a motion for the entire bench of Court to recuse themselves under Student Body Statute 402.1, ensuring that a law student outside the Court would be the acting Chief Justice and pick a new bench of Associate Justices to ensure proper compliance with the Court's rules throughout the proceedings. (**Exhibit 10C**) However, the Court denied the recusal by reinterpreting the requirement for oral hearings under Rule 4.1 as optional through Rule 3.1. (**Exhibit 10D**) Under Rule 3.1 of the Rules of Practice & Procedure, the Court may hold a public preliminary hearing on all matters submitted to the Court. If the Court decides to hold a preliminary hearing, it will decide whether to hear the case. By treating the preliminary hearings as optional, the Court extended those reservations to oral hearings. As such, the Chief Justice and the Court refused to recuse themselves through their reinterpretation. (**Exhibit 10D**) The Court's reinterpretation of Rule 4.1 under the current Chief Justice only serves to harm any case challenging the current apportionment process, contributing to the preservation and reinforcement of the at-Large model that has benefited the FBK-backed Vision Party's supermajority in the Student Senate under Senate President Maya Idiculla. Without in-person hearings, no petitioner can be present in the courtroom during deliberations to hear the discussion among the Justices, receiving the final judgment only via email after two weeks of silence.

In response, several Public Records Requests were filed as per Student Body Statute 102.1, which mandates Florida Sunshine Law's application to Student Government as a state governmental agency, for the internal communications and deliberations on the aforementioned cases and motions of recusal. However, the Court has delayed responses to Public Records Requests, resulting in an unreasonable wait for nearly three months. By breaking the rules and reinterpreting them to deny motions of recusal along with potentially delaying the release of

Public Records into the Court's internal communications and deliberations, the Supreme Court under Chief Justice Hagen Turner has fully insulated itself from public accountability and oversight on its judicial matters, protecting the current political status quo of Florida Blue Key's state capture of the Student Government via the System-aligned Vision Party.

6.6: The refusal to review the constitutionality of apportionment data upholds the at-Large map allows for the FBK-backed/System-aligned Vision Party under Senate President Maya Idiculla to have complete budgetary control

The University of Florida Supreme Court, under Chief Justice Hagen Turner, has engaged in actions that violate and reinterpret its own rules and procedures, as well as denying judicial review of the constitutionality of neutral apportionment data to uphold the at-Large model. (**Exhibits 10A-10D**) The at-Large model creates a winner-take-all electoral structure that has been extremely beneficial to the FBK-backed and System-aligned Vision Party over the past few election cycles, enabling it to dominate off-campus areas through plurality voting. (**Exhibits 9K, 9P, 9Q**) The Court has ignored claims of discrimination by refusing judicial review and allowed for the continued use of data obtained by the Registrar's Office under Student Body Statute 322.51 despite the acknowledged structural flaws of data collection with only 22.7% of off-campus students having a reported zip code in Alachua County. (**Exhibits 9F, 9N, 9O, 9R-9S, 10A**) Such an electoral structure is easily susceptible to manipulation by Florida Blue Key and its political machine, composed of thousands of students from fraternities and sororities, who are compelled to vote via the voting sticker collection mechanism. These details have been explicitly documented and preserved for public analysis in the 1998 Grapski defamation trial through testimonies, depositions, and affidavits; various academic papers published from 2005 to 2025; the 2010 Unite Tapes; and various media articles. (**Exhibit 1A-1F, 2A-2C, 3A-3C, 4F, 5A-5C, 6A-6B**)

The tapping process for membership in Florida Blue Key is directly entangled with the political machine's horsetrading of positions between Greek life fraternities and sororities within the Student Government. (**Exhibit 1B, 1C, 1E, 2B**) A connection between Florida Blue Key, Chief Justice Hagen Turner, and Senate President Maya Idiculla has been demonstrated by their shared membership in the leadership honorary, Tapping Classes of Fall 2022 and Spring 2025, respectively. (**Exhibit 7A-7B**) Moreover, both the Chief Justice and Senate President share prior political affiliations with the immediately preceding FBK-backed party to the Vision Party, the Gator Party, as senatorial candidates. (**Exhibit 7C-7D**) As active members of FBK who are the respective heads of the legislative and judicial branches, both share a strategic obligation to maintain the political status quo of Florida Blue Key's state capture of the Student Government by maintaining the supermajority of the FBK-backed party in the Student Senate. By ensuring a supermajority of the legislature via the winner-take-all system set by the at-Large, off-campus district, any annual Activity & Service Fee budget bills, which distribute thousands of dollars to

ACCENT Speakers Bureau and Student Government Production, are passed by the Budget & Appropriations Committee are left unchallenged by any minority party, including the cohesive opposition to FBK and the System, the Independent movement. A supermajority of the FBK-backed party would also leave executive nominations to ACCENT and Student Government Productions unchallenged, despite public scrutiny and media investigations that have found both agencies captured by Alpha Epsilon Pi and Theta Chi as legacy positions through the System. (**Exhibit 4A-4C, 4F**) As a result, FBK can continue earning Gator Growl subsidies of Activity & Service fee dollars via SGP and allow other FBK members to take financial incentives by running the private talent agency, Greater Talent Network in collaboration with ACCENT. (**Exhibits 4A-4E**) All of these aforementioned acts and behaviors constitute a violation of **Student Body Statutes 101.43, 101.41, and 101.45** under Chapter 101 of the Student Government Code of Ethics.

CONCLUSION

As mandated under **Student Body Statutes 101.61 and 101.72**, the Rules and Ethics Chair must recuse themselves in the event that the accused shares a mutual executive-board relationship. In this case, the Senate President maintains this relationship by serving on the Senate Executive Board alongside the Rules and Ethics Chair. Under **Student Body Statute 402.1**, the Chief Justice must recuse themselves in the event of being an interested party/accused individual before final judgment. As such, the authority to assign a special investigator to determine probable cause lies with the **Acting Chief Justice,** who will be an Associate Justice appointed to take their place, as per Rule 6.2 of the Supreme Court Rules of Practice & Procedure.

The eligible student assigned by the acting Chief Justice as the independent special investigator must determine whether there is probable cause to investigate under **Student Body Statutes 101.71**–1**01.73**. The standard is not whether the accused individuals are guilty, but whether the allegations, supported by evidence, warrant further inquiry via a preliminary investigation.

Sets 1-10 have demonstrated a likely connection between **Senate President Maya Idiculla** and **Chief Justice Hagen Turner** via their membership in Florida Blue Key, an exclusive leadership honorary that has been extensively documented by academic papers and newspaper articles and recognized in a court of law to have political involvement in the University of Florida Student Government through a political machine known as ‘The System.’Through their strategic cooperation as heads of the legislative branch and judicial branch, both individuals utilized their positions of authority to uphold a winner-take-all system that protects the political status quo of the Student Government’s current state capture under FBK with the Senate President ensuring the passage of apportionment bills that reinforce the at-Large model and the Vision Party’s

electoral dominance of all off-campus seats, and the Chief Justice breaking the Supreme Court Rules of Practice & Procedure to prevent oral arguments of cases challenge the model such as a case claiming the Judiciary Committee's judgment of the latest apportionment bill as arbitrary and capricious or another case that claims discrimination within the institutional neutrality of the apportionment data and inducing other Associate Justices to act against Student Body Statute 102.1 to delay the release of Public Records of the deliberations and internal communications of both cases.

Through the preservation and reinforcement of the at-Large, off-campus model, the latest iteration of the FBK-backed party, the Vision Party, has continued to hold a majority of the seats in the Student Senate and control the passage of Activity & Service Fee annual budgets from the Budget & Appropriations Committee and executive nominations for the ACCENT Speakers Bureau and Student Government Productions. Such practices are aligned with Florida Blue Key's alleged monetary conflicts of interest in both agencies, where they have been collecting tuition dollars through Gator Growl subsidiaries via SGP, and allowing FBK members within the private talent agency, the Greater Talent Network, to take a share of tuition dollars via their collaboration with ACCENT's shows. Such acts by both individuals demonstrate likely unlawful compensation, disregard for official behavior, conflicts of interest, and inducement of other SG officials to act against the statutes in Chapter 101 of the Student Government Code of Ethics.

The hereinabove-described behavior, if verified, represents a departure from the lawful functions bound to Student Government officials and a breach of the ethical and statutory limits imposed on the legislature and judiciary. These facts, when taken together, warrant a formal inquiry into whether Student Government officials violated their official responsibilities by acting and forcing others to act on conflicts of interest to an external organization.

REQUEST FOR RELIEF

Petitioners respectfully request that the following relief is granted:

1. **Order recusal and disqualification of the Rules and Ethics Chairperson** from conducting any preliminary investigation or exercising authority under Statute 101.71 due to lack of independence under Statutes 101.72 and 101.61.
2. **Grant Petitioners' motion to disqualify and recuse the Chief Justice** pursuant to Statute 402.1 from taking any action in connection with the Complaint, including invoking Statute 101.72 or appointing any special investigator.
3. **Designate an Associate Justice to serve as Acting Chief Justice** under Rule 6.2 of the Supreme Court Rules of Practice & Procedure for purposes of this matter so required statutory duties may be performed by a neutral judicial officer.

4. **Order appointment of an independent special investigator pursuant to Statute 101.72** to assume the responsibilities of the Rules and Ethics Chairperson described in Chapter 101, with independence pursuant to Statute 101.61.
5. **Direct convening of the Commission on Ethics pursuant to Statute 101.73** upon a showing of probable cause, including recognition that in case of investigation of the Chief Justice the Executive Director/Chancellor of the Honor Code Administration shall convene the Commission.
6. **Authorize subpoena power pursuant to Statute 101.731** to obtain evidence and testimony under oath, and require that the convening judicial officer preside and sign subpoenas.
7. **Order that investigation and witness examination duties be carried out** by the independent special investigator (in lieu of the recused Ethics Chair), consistent with Statute 101.731.
8. **Require a written report pursuant to Statute 101.732** with findings and conclusions approved by ten members of the Commission.
9. **Require submission and distribution of the report pursuant to Statute 101.732** to the presiding officer for review and then to all accused individuals.
10. **Grant any further relief necessary** to ensure lawful compliance with Student Body Statutes 101.41, 101.43, 101.45, 101.61, 101.71, 101.72, 101.73, 101.731, 101.732, and 402.1.